

## **EXHIBIT 30**

### **Declaration of Marshall Winn in Support of Default Judgment and Award of Attorney's Fees and Costs dated December 31, 2020**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION**

Zdenek Bakala,

*Plaintiff,*

vs.

Pavol Krupa, Adam Swart, and  
Crowds on Demand LLC,

*Defendants.*

C.A. No.: 9:18-cv-02590-DCN

**DECLARATION OF  
MARSHALL WINN  
IN SUPPORT OF DEFAULT  
JUDGMENT AND AWARD OF  
ATTORNEYS' FEES AND COSTS**

I, Marshall Winn, declare as follows:

1. I am an attorney and member of the law firm Wyche P.A. ("Wyche"). I represent Plaintiff Zdenek Bakala in the above captioned action. I am a member of the South Carolina Bar and am admitted to practice before this Court. The representations made in this declaration are based on my personal knowledge and, if called upon to do so, I could and would testify competently thereto.

2. I respectfully submit this declaration in support of Mr. Bakala's Motion for Default Judgment against Defendant Pavol Krupa ("Krupa"), pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, and the attorneys' fees and costs pursuant to 18 U.S.C. § 1964(c) and Local Civil Rule 54.03.

3. Mr. Bakala seeks a default judgment:

- a. on his First Cause of Action against Krupa for violation of the Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. § 1962(c);
- b. on his Second Cause of Action against Krupa for violation of RICO, 18 U.S.C. § 1962(d);

- c. on his Third Cause of Action against Krupa for defamation; and
- d. on his Fourth Cause of Action against Krupa for tortious interference.

4. On September 21, 2018, Mr. Bakala filed a complaint in the United States District Court for the District of South Carolina (Case No. 9:18-cv-02590-DCN). (ECF 1).

5. Mr. Bakala filed an Amended Complaint on October 11, 2018. (ECF 15). Krupa was served with true and correct copies of the Summons and Amended Complaint on February 17, 2019, in accordance with Rule 4(f) of the Federal Rules of Civil Procedure and as authorized by the Hague Convention. (ECF 53, Proof of Service).

6. The Court ordered Krupa to respond to Mr. Bakala's Amended Complaint by November 14, 2019. (ECF 96). On November 19, 2019, Krupa filed the first of several deficient answers. (ECF 98, 107, and 109). The Court struck Krupa's deficient answers on February 21 and May 11, 2020. (ECF 130, 149).

7. On May 11, 2020, the Court ordered Krupa to file an answer that complied with the "rules governing answers" within 21 days. ECF 149. Krupa did not file an answer.

8. Krupa was advised by notice dated June 5, 2020 that an order of default was to be taken but did not respond. (ECF 157). On June 8, 2020, the Clerk entered an order of default. (ECF 159).

9. Krupa has made no effort to respond to the Court since the entry of default on June 8, 2020, now more than six months ago.

10. Mr. Bakala seeks attorneys' fees of \$2,762,483.16, plus costs and litigation expenses in the amount of \$66,334.60, for a total of \$2,828,817.76 in costs and fees.

**Attorney Information**

11. Attorneys of Wyche and other professionals of the firm worked on this case for 2,087.90 hours.

12. Attached hereto as **Appendix A** is an accurate summary of the work performed by Wyche in connection with this matter. In my opinion and experience, the fees and expenses were reasonably and necessarily incurred, and are of a type that are customarily and normally billed to, and paid by, Wyche's clients.

13. The attorneys with principal involvement with this litigation from Wyche were myself, Wallace K. Lightsey, Rachael L. Anna, and McKinley Hyman. Sarah Davis also provided important paralegal support. All of the hourly rates used for the attorneys and paralegal in the calculation of fees for this case are the standard hourly rates charged for those attorneys and paralegals by Wyche for this type of legal work.

14. Our professional standing is one of the factors for the Court's consideration. Wyche has been recognized as an AV-rated firm in the *Martindale-Hubbell* listing for decades; Chambers USA Band 1 law firm for Commercial Litigation in 2019; and Tier 1 "Best Law Firm" in Commercial Litigation and six other litigation categories by U.S. News – Best Lawyers® in 2019. To assist the Court in measuring such professional standing, I submit brief excerpts from our respective resumes as follows:

a. I am a 1974 *summa cum laude* and Phi Beta Kappa graduate of the University of South Carolina Honors College and a 1982 graduate of Harvard Law School. I was admitted to the South Carolina Bar in 1982 and have been with Wyche since 1985. In addition to my experience as a trial lawyer handling complex litigation in federal and state courts, I have also

served as outside general counsel to several clients based in Europe, handling legal matters for all their businesses in the United States.

b. Wallace K. Lightsey is a member of Wyche's litigation practice group. He is a 1979 *summa cum laude* graduate of Duke University and a 1983 *cum laude* graduate of Harvard Law School, where he was Executive Editor of the *Harvard Law Review*. Mr. Lightsey clerked from 1983 to 1984 for Judge John Minor Wisdom of the United States Court of Appeals for the Fifth Circuit, and from 1984 to 1985 for Chief Justice Warren E. Burger of the United States Supreme Court. He has practiced law since 1986 and has been with Wyche from his admission to the bar to the present. During his career, Mr. Lightsey has handled hundreds of cases in state and federal trial and appellate courts. Mr. Lightsey was elected a fellow of the American College of Trial Lawyers in 2004 in recognition of his jury trial experience. In 2019, he was inducted into the American Academy of Appellate Lawyers.

c. Rachael L. Anna is a member of Wyche's litigation practice group. Ms. Anna is a 2001 graduate of Wake Forest University and 2007 graduate of Wake Forest School of Law. From 2007 to 2012, Ms. Anna worked as an associate in the Antitrust Practice Group with McDermott Will & Emery LLP in Washington, D.C. and Chicago, Illinois, focusing on complex civil and criminal investigations and litigation in various federal courts.

d. McKinley Hyman is an associate in Wyche's litigation practice group. Ms. Hyman is a 2013 *summa cum laude* graduate of the University of South Carolina and 2016 graduate of the University of Virginia School of Law, where she was an Editorial Board Member of the *Virginia Tax Review*.

15. Attorneys of Quinn Emanuel Urquhart & Sullivan (“Quinn Emanuel”) and other personnel worked on this case for 1,898.20 hours. Quinn Emanuel is an international, multi-service law firm with over 800 attorneys working in twenty-three offices in ten different countries.

16. **Appendix B** is an accurate summary of the work performed by Quinn Emanuel in connection with this matter. It is my understanding that the fees were reasonably and necessarily incurred, and are of a type that are customarily and normally billed to, and paid by, Quinn Emanuel’s clients.

17. The lawyers primarily involved in this action from Quinn Emanuel were Andrew H. Schapiro, Stephen Andrew Swedlow, Margaret Haas, Carl Richard Hennies, and David Lakin. I submit brief excerpts from the respective resumes of the attorneys from Quinn Emanuel as follows:

i. Andrew H. Schapiro is a partner in Quinn Emanuel’s Chicago office. After graduating *magna cum laude* and Phi Beta Kappa from Yale University in 1985, Mr. Schapiro was a Marshall Scholar at Oxford University, where he received a masters degree in 1987. Mr. Schapiro graduated *magna cum laude* from Harvard Law School and was Articles Co-Chair of the *Harvard Law Review* and a recipient of the Sears Prize. Mr. Schapiro clerked from 1991 to 1992 for Judge Richard A. Posner of the United States Court of Appeals for the Seventh Circuit, and from 1992 to 1993 for Justice Harry A. Blackmun of the United States Supreme Court. From 2014 until 2017, Mr. Schapiro served as the U.S. Ambassador to the Czech Republic, having been nominated to the position by President Obama and confirmed by a unanimous United States Senate.

b. Stephen Andrew Swedlow is a partner in Quinn Emanuel’s Chicago’s office. Mr. Swedlow is a 1992 graduate of Miami University (Ohio) and 1995 *summa cum laude* graduate of the Ohio State University College of Law, where he was Associate Editor of the Ohio

State University Law Review. Mr. Swedlow clerked from 1995 to 1996 for Judge Jerome Farris of the United States Court of Appeals for the Ninth Circuit.

c. Margaret Haas is an associate in Quinn Emanuel's Chicago office. She graduated with *Highest Honors* and as Bronze Tablet recipient from the University of Illinois at Urbana-Champaign in 2009 and *cum laude* from Harvard Law School in 2012.

d. Carl Richard Hennies is an associate in Quinn Emanuel's Houston office. Mr. Hennies is a 2009 graduate from the University of North Carolina at Chapel Hill and a 2013 graduate of the University of Virginia School of Law, where he was an Order of the Coif recipient. Mr. Hennies clerked from 2013 to 2015 for Judge David C. Norton of the United States District Court, District of South Carolina and from 2015 to 2016 for Judge Henry F. Floyd of the United States Court of Appeals for the Fourth Circuit.

e. David Lakin is an associate in Quinn Emanuel's Chicago office. Mr. Lakin is a 2012 graduate of the University of Michigan and 2017 *cum laude* graduate of the Northwestern Pritzker School of Law.

#### **Rates and Hours Included in the Fee Request**

18. I have reviewed all of the time entries made by each timekeeper for the work in this litigation, and in my opinion, the billing rates and the time amounts are reasonable and appropriate.

19. The hourly rates shown in the table attached as Appendix A to this declaration are Wyche's standard hourly rates for legal work of this type. The standard rates charged by each Wyche attorney and paralegal are consistent with rates charged in cases of comparable complexity in South Carolina and in federal courts in the Southeast.



20. The hourly rates for the Quinn Emanuel attorneys are consistent with prevailing rates for attorneys of similar ability and experience in large international law firms in the Chicago, Illinois and Houston, Texas metropolitan areas.

21. The rates of Mr. Bakala's attorneys are consistent with the rates of the attorneys from Wiley Rein and Moore & Van Allen, who were engaged as counsel and then fired by Krupa.

22. All attorneys and paralegals at Wyche and Quinn Emanuel routinely record their time expended on all billable matters contemporaneously. Daily time entries are entered by each timekeeper into a timekeeping computer software program which stores all time entries by case. This standard time-keeping procedure was followed in this case by Wyche and Quinn Emanuel attorneys. The summaries presented in Appendices A and B accurately reflect the daily time entries stored in the time-keeping computer software program for both law firms, with minor editing of a small number of entries to remove material protected by the work product doctrine or attorney-client privilege.

23. The hours worked by Mr. Bakala's attorneys between 2017 and 2020 were reasonable given the complex factual and unique issues involved, and in light of the tenacity of the defense by Wiley Rein's attorneys, prior to being terminated as counsel by Krupa. The types of activities for which Mr. Bakala seeks reimbursement, such as factual investigation, jurisdictional and fact discovery, attorney consultations, and motion practice, are all necessary types of activities engaged in by litigators, and as such, are presumptively compensable.

24. I have reviewed all of the time entries made by the individuals listed in Appendices A and B for their work in this case and, in my opinion, the billing rates and the time amounts are reasonable and appropriate. The hourly rates vary among attorneys according to the experience level of the attorney and the complexity of the tasks to which that attorney was assigned. The rates



cited are all commensurate with practitioners' rates for matters of this complexity and sophistication.

25. I have considered all relevant factors, including the nature, extent and difficulty of the issues presented in this case; the experience and ability of counsel; the time necessarily devoted to the case; fee awards in similar cases; and the results obtained. They reflect the reasonable market value for the services rendered, as well as the work which was necessary to obtain the relief sought by Mr. Bakala. Based upon all of the relevant considerations, it is my opinion that \$2,762,483.16 is a reasonable amount for an award of attorneys' fees for the efforts in this case on behalf of Mr. Bakala's attorneys.

26. The fees identified in Appendix A were in fact billed to and paid by Mr. Bakala, and have not been reconstructed.

**Litigation Costs Incurred in this Action**

27. Mr. Bakala seeks \$23,923.64 billed by Wyche and \$42,410.96 billed by Quinn Emanuel for expenses, including electronic discovery costs, travel expenses, court reporter fees, and other related litigation expenses.

28. In sum, Mr. Bakala is seeking an award of attorneys' fees and costs in the following amounts:

<b>Description of Fees or Costs</b>	<b>Amount</b>
Attorney Fees for Wyche	\$1,008,413.50
Costs Incurred by Wyche	\$23,923.64
Attorney Fees for Quinn Emanuel	\$1,754,069.66
Costs Incurred by Quinn Emanuel	\$42,410.96
<b><u>Total</u></b>	<b>\$2,828,817.76</b>

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 31<sup>st</sup> day of December, 2020, in Greenville, South Carolina.

A handwritten signature in blue ink, appearing to read "Marshall Winn", is written over a horizontal line.

Marshall Winn

## APPENDIX A

Date	Timekeeper	Hours	Rate	Amount	Narrative
9/4/2018	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Conference call with Andy Schapiro; conference with Marshall Winn
9/5/2018	Stephen R. Layne	0.70	\$350.00	\$ 245.00	Commence review of service of process options on Pavol Krupa.
9/5/2018	Cathy Bryant	2.40	\$250.00	\$ 600.00	Receipt and review of Complaint; draft Answers to Local Rule 26.01 Interrogatories and Civil Cover Sheet
9/6/2018	Wallace Lightsey	0.90	\$650.00	\$ 585.00	Telephone conference with co-counsel re draft complaint
9/6/2018	Stephen R. Layne	0.40	\$350.00	\$ 140.00	Continue research re: service under the Hague Convention.
9/6/2018	Cathy Bryant	3.70	\$250.00	\$ 925.00	PACER and Internet searches on Crowds on Demand and Adam Swart
9/7/2018	Stephen R. Layne	2.10	\$350.00	\$ 735.00	Complete research and draft memorandum re: service of process on Pavol Krupa in the Czech Republic under the Hague Convention.
9/10/2018	Eric Graben	0.40	\$500.00	\$ 200.00	Review changes to Cooperation Agreement and related correspondence.
9/11/2018	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Review emails and revisions to draft complaint
9/11/2018	Cathy Bryant	1.20	\$250.00	\$ 300.00	Accurint Searches of Crowds on Demand and Adam Swart; search for cases filed against either Crowds on Demand or Adam Swart
9/12/2018	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Conference with Marshall Winn; review comments on draft complaint; telephone conference with Andy Schapiro re action plan
9/12/2018	Eric Graben	0.50	\$500.00	\$ 250.00	Correspondence with Marshall Winn regarding Agreement.
9/13/2018	Jennifer Whatley	0.00	\$ -	\$ -	Drafted transfer letters. Met with attorney.
9/14/2018	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review emails re other tortious actions by defendants
9/18/2018	Marshall Winn	3.20	\$650.00	\$ 2,080.00	Preparation of complaint; related communications with Mr. Lightsey and Mr. Schapiro; telephone conferences with and email communications with Mr. Paul
9/19/2018	Marshall Winn	3.80	\$650.00	\$ 2,470.00	Conferences with Mr. Schapiro; review revised complaint; preparation of further comments; email communications with Czech and Switzerland counsel
9/19/2018	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Review revised complaint and emails re same
9/20/2018	Marshall Winn	5.20	\$650.00	\$ 3,380.00	Telephone conferences with Mr. Schapiro; telephone conferences with Mr. Bakala and co-counsel; attention to procedural matters; conferences with paralegals re interrogatories and initial filings, pro ha vice preparations, and related matters
9/20/2018	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Telephone conference with Chris Schoen; telephone conference with Marshall Winn re same and re preparations
9/20/2018	Stacey Wascom	1.00	\$250.00	\$ 250.00	Brief meeting with Marshall Winn regarding status of case and action items; preparation of Application for pro hac vice for admission of attorneys in Chicago.
9/20/2018	Cathy Bryant	4.70	\$250.00	\$ 1,175.00	Review draft Complaint; CA Secretary of State search for Registered Agent information for Crowds on Demand LLC; draft Summons to Crowds on Demand LLC, Pavol Krupa and Adam Swart; draft Civil Cover Sheet; revise Answers to Rule 26.01 Interrogatories; draft Applications for Admission Pro Hac Vice of Mr. Schapiro, Mr. Swedlow and Ms. Haas
9/21/2018	Marshall Winn	15.50	\$650.00	#####	Email communications with client; final preparation and filing of complaint and related documents; related telephone conferences and email communications with Messrs Schapiro et al.; telephone conferences and email communications with Mr. Paul; attention to filing of Bakala v. Krupa et al. in U.S. District Court for the District of South Carolina and confirmation of same; related follow up correspondence with client and counsel
9/21/2018	Wallace Lightsey	1.20	\$650.00	\$ 780.00	Review emails re complaint allegations and related matters; review and comment on civil cover sheet, draft complaint; review Hendricks opinion in Civil Rico case
9/21/2018	Cathy Bryant	6.40	\$250.00	\$ 1,600.00	Review and revise Civil Cover Sheet, Summons, Complaint, Responses to 26.01 Interrogatories; make additional revisions per Mr. Winn; prepare for and file same with the Court
9/24/2018	Marshall Winn	5.50	\$650.00	\$ 3,575.00	Telephone conferences with office of Clerk of Court re filings; follow up with paralegal; conferences with Mr. Lightsey; email communications with Mr. Schapiro et al. re service and related follow up; work on strategies; conferences with Dartmouth general counsel et al.
9/24/2018	Cathy Bryant	4.60	\$250.00	\$ 1,150.00	Receipt of and save filed-stamped copies of the Complaint, Summons to each Defendant, and Responses to Local Rule 26.01 Interrogatories; provide co-counsel with copies of same; draft an amended Summons to Crowds on Demand LLC; email same to the Clerk of Court for issuance; revise Applications for Admission for Mr. Schapiro, Mr. Swedlow and Ms. Haas; email same to Mr. Lakin
9/24/2018	Cathy Bryant	0.10	\$250.00	\$ 25.00	Email Applications for Admission Pro Hac Vice for Messrs. Schapiro, Swedlow and Ms. Haas to Mr. Lakin for completion
9/25/2018	Marshall Winn	6.50	\$650.00	\$ 4,225.00	Follow up re witnesses, strategy; related correspondence with co-counsel and client

## APPENDIX A

Date	Timekeeper	Hours	Rate	Amount	Narrative
9/25/2018	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Conference with Marshall Winn re amendment of complaint; emails re service and strategic issues; review article re Krupa
9/25/2018	Cathy Bryant	0.20	\$250.00	\$ 50.00	Email communications with Messrs. Winn and Lightsey regarding the Applications for Admission Pro Hac Vice
9/26/2018	Marshall Winn	3.30	\$650.00	\$ 2,145.00	Email communications with and telephone conferences with Mr. Schapiro re responses to press inquiries; attention to strategy and witness matters
9/26/2018	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails re strategic issues and conference with Marshall Winn re same
9/26/2018	Cathy Bryant	2.00	\$250.00	\$ 500.00	Telephone conference with Clerk of Court; revise Applications for Mr. Schapiro, Swedlow, and Ms. Haas; email Ms. Fuller regarding the need for new Certificates of Good Standing and to re-sign and date the Applications upon receipt of the new Certificates of Good Standing
9/27/2018	Marshall Winn	4.30	\$650.00	\$ 2,795.00	Conferences with Czech counsel; conferences with Mr. Schapiro re witnesses and additional factual developments; review documents
9/28/2018	Marshall Winn	3.20	\$650.00	\$ 2,080.00	Review and analysis of translated portions of Krupa interview; email communications with Mr. Schapiro re possible amended complaint; email communication with and telephone conference with Dartmouth general counsel re witnesses; related follow up
10/2/2018	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Conferences with counsel re amended complaint; receive and review proof of service; attention to filing of same with paralegal
10/2/2018	Cathy Bryant	0.20	\$250.00	\$ 50.00	Prepare pleading index and hyper-link pleadings to same
10/3/2018	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Review documents re admissions of defendants; conferences with co-counsel; follow up re service
10/3/2018	Cathy Bryant	2.70	\$250.00	\$ 675.00	Receipt of Proofs of Service on Adam Swart and Crowds on Demand; prepare Notices of Filing of Proof of Service; prepare for and file the Notices of Filing of Proof of Service and Proofs of Service with the Court; download and save filed documents from the Court; update the pleading index and hyper-link pleadings to same
10/4/2018	Marshall Winn	3.20	\$650.00	\$ 2,080.00	Email communications with and telephone conferences with Mr. Schapiro et al. re further factual development and preparation of amended complaint; related work; pro hac vice applications
10/4/2018	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Review emails re additional harassment, amendment of complaint; address litigation hold memo
10/4/2018	Cathy Bryant	3.80	\$250.00	\$ 950.00	Draft Motions for Admission Pro Hac Vice and proposed Orders for Ms. Haas, Mr. Schapiro and Mr. Swedlow; review DSC forms; email communications with Mr. Winn regarding same; prepare for and file motions for admission, applications, certificates of good standing and proposed orders; download and save each document; provide email information to Mr. Winn to send to Judge Norton with the proposed orders
10/5/2018	Marshall Winn	1.20	\$650.00	\$ 780.00	Email communications with Mr. Schapiro re amended complaint and re press inquiries; further work
10/5/2018	Cathy Bryant	0.70	\$250.00	\$ 175.00	Prepare for and file Motions for Admission Pro Hac Vice for Margaret Haas, Andrew Schapiro and Stephen Swedlow; download filed copies and save same; email filed-stamped copies to Messrs. Schapiro and Swedlow, and Ms. Haas; download and save Orders granting admission for same; email copies of the orders to Messrs. Schapiro and Swedlow, and Ms. Haas; update caption to reflect admissions pro hac vice
10/6/2018	Marshall Winn	0.90	\$650.00	\$ 585.00	Email communications with Mr. Schapiro et al. re press inquiries and re amended complaint; related work
10/7/2018	Marshall Winn	0.80	\$650.00	\$ 520.00	Review miscellaneous strategic and tactical issues
10/8/2018	Marshall Winn	4.20	\$650.00	\$ 2,730.00	Telephone conference with Messrs Schapiro et al. and Czech counsel re amended complaint; related work and follow up; review and comment on draft amended complaint
10/9/2018	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Work on amended complaint; related correspondence with Mr. Schapiro and colleagues
10/10/2018	Marshall Winn	1.50	\$650.00	\$ 975.00	Attention to amended complaint; attention to litigation hold; witness matters
10/11/2018	Marshall Winn	5.40	\$650.00	\$ 3,510.00	Final preparation of amended complaint; related conferences with co-counsel; filing of pleading; conferences with co-counsel re service; communication with witnesses
10/11/2018	Cathy Bryant	1.10	\$250.00	\$ 275.00	Review Amended Complaint; prepare for and file same with the Court; email communications with co-counsel regarding procedure for service of same
10/12/2018	Marshall Winn	0.90	\$650.00	\$ 585.00	Follow up after filing; attention to service; related conferences with co-counsel
10/13/2018	Marshall Winn	0.60	\$650.00	\$ 390.00	Email communications with co-counsel; attention to service of process; related conferences with paralegal
10/14/2018	Marshall Winn	1.10	\$650.00	\$ 715.00	Email communications with Mr. Bakala; follow up re legal matters
10/15/2018	Marshall Winn	3.10	\$650.00	\$ 2,015.00	Email communications with Mr. Bakala re interview; related communications with co-counsel; attention to procedural matters
10/15/2018	William M. Wilson	1.60	\$425.00	\$ 680.00	Address issues re service of amended complaint; legal research re same; email to David Lakin re same

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Date	Timekeeper	Hours	Rate	Amount	Narrative
10/15/2018	Cathy Bryant	2.60	\$250.00	\$ 650.00	Receipt of Proofs of Service by Mail of the Amended Complaint on Crowds on Demand LLC and Adam Swart; draft Notices of Filing of Proofs of Service on Crowds on Demand LLC and Adam Swart; prepare for and file Notice of Filing of Proof of Service and Proof of Service of the Amended Complaint on Crowds on Demand LLC; prepare for and file Notice of Filing of Proof of Service and Proof of Service of the Amended Complaint on Adam Swart; download and save filed pleadings; email same to Mr. Lakin
10/16/2018	Marshall Winn	1.10	\$650.00	\$ 715.00	Email communications with co-counsel re legal matters and responses to media inquiries
10/17/2018	William M. Wilson	0.20	\$425.00	\$ 85.00	Emails re filing new affidavits of service
10/17/2018	Cathy Bryant	1.20	\$250.00	\$ 300.00	Telephone conference with Mr. Lank regarding filing of second set of Proof of Service by Mail; receipt and review of documents; prepare Notice of Filing of Proof of Service on Adam Swart; prepare Notice of Filing Proof of Service on Crowds on Demand LLC; prepare for and file same with the Court
10/18/2018	Marshall Winn	1.10	\$650.00	\$ 715.00	Email communications with counsel for Swart and Crowds on Demand LLC re acknowledgment of service of process of Amended Complaint and request for extension of time; acknowledgment of same via email; related correspondence with co-counsel
10/18/2018	Cathy Bryant	0.40	\$250.00	\$ 100.00	Review court rules; review calendar to determine due dates to the original Complaint; determine due date for defendants' answers to the Amended Complaint; calendar same
10/19/2018	Marshall Winn	1.10	\$650.00	\$ 715.00	Research
10/22/2018	Marshall Winn	3.40	\$650.00	\$ 2,210.00	Attention to legal matters; communications with co-counsel; related follow up
10/23/2018	Wallace Lightsey	1.60	\$650.00	\$ 1,040.00	Review and respond to emails re amended complaint, press inquiries, service of amended complaint, and preparation for meeting; conference with Marshall Winn re same; review Amended Complaint
10/23/2018	Cathy Bryant	1.70	\$250.00	\$ 425.00	Email from Mr. Lakin regarding issuance of Summons for Mr. Krupa with new address; draft Summons and email to Mr. Lakin for his review; numerous email communications regarding service of the Amended Complaint and counsel for Adam Swart and Crowds on Demand; telephone conference with the Clerk's Office regarding issuance of the Summons; telephone conference with Mr. Winn; email Summons to the Clerk's Office for issuance; receipt of Summons issued by the Court
10/24/2018	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Email communications with co-counsel re service of process matters and related matters; litigation strategy
10/25/2018	Marshall Winn	4.20	\$650.00	\$ 2,730.00	Conferences with co-counsel re litigation strategy and preparation for interview
10/25/2018	Wallace Lightsey	2.00	\$650.00	\$ 1,300.00	Conference call with Andy Schapiro and David Paul; review complaint and prepare for meeting; telephone conference with Chris Schoen re same
10/26/2018	Marshall Winn	7.50	\$650.00	\$ 4,875.00	Review and preparation for witness meeting
10/26/2018	Wallace Lightsey	7.80	\$650.00	\$ 5,070.00	Travel to Columbia; telephone conference with Chris Schoen; conferences with Marshall Winn; review Complaint and materials from David Paul; travel to Hilton Head
10/27/2018	Marshall Winn	10.50	\$650.00	\$ 6,825.00	Conference with client, Messrs Lightsey and Schapiro in preparation for interview; attend and participate in client interview; follow up conference with client; telephone conferences with Messrs Paul and Schapiro
10/27/2018	Wallace Lightsey	10.50	\$650.00	\$ 6,825.00	Prepare for meetings; meet with Mr. Bakala and others; telephone conference with David Paul; telephone conference with Andy Schapiro; conferences with Marshall Winn; return to Greenville
10/29/2018	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review documents from David Paul; draft memo re interview
10/30/2018	Marshall Winn	3.20	\$650.00	\$ 2,080.00	Telephone conference with Mr. Daniel and others re follow up; address related matters; email communications with Mr. Schapiro et al re service of process and other procedural matters
10/30/2018	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Conference with Marshall Winn; call to Bart Daniel (message left); telephone conference with Mr. Daniel with Mr. Winn
10/31/2018	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Email communications with Mr. Daniel re evidentiary matters and follow up; email communications with Mr. Schapiro
10/31/2018	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review transcript of Soukup interview of Krupa and email co-counsel re same; review emails with Bart Daniel
10/31/2018	Cathy Bryant	0.30	\$250.00	\$ 75.00	Email communications with Mr. Lakin and Ms. Fuller regarding certified copies of the Summons for Mr. Krupa and the Amended Complaint for service
11/1/2018	Marshall Winn	2.20	\$650.00	\$ 1,430.00	Conference with witnesses; attention to Hague Convention protocols
11/1/2018	Wallace Lightsey	1.70	\$650.00	\$ 1,105.00	Review notes and file materials; draft summary of interview; email co-counsel re same
11/1/2018	Cathy Bryant	1.70	\$250.00	\$ 425.00	Telephone conference with the Clerk's office in Greenville; assemble copies of the Amended Complaint, Answers to Local Rule 26.01 Interrogatories and Summons to Krupa for certified copies; request check; prepare request form for our Office Services to get the certified copies; draft letter to Mr. Glatz providing certified copies of documents for service of process

## APPENDIX A

Date	Timekeeper	Hours	Rate	Amount	Narrative
11/2/2018	Marshall Winn	6.20	\$650.00	\$ 4,030.00	Conferences with witnesses, Mr. Paul, client
11/2/2018	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Emails re service and Hague Convention process
11/2/2018	Cathy Bryant	0.60	\$250.00	\$ 150.00	Receipt and review of email communications between Messrs. Lightsey, Winn, Schapiro, Swedlow, Lakin and Ms. Haas; review and save the article "New Orleans fines Entergy \$5M over actors paid to support gas plant"
11/5/2018	Stephen R. Layne	2.00	\$230.00	\$ 460.00	Confer with Marshall Winn and research re: current and past cases involving civil RICO claims.
11/5/2018	Cathy Bryant	0.70	\$250.00	\$ 175.00	Receipt of and save Fed Ex Service Confirmation; telephone call from Sheila at the Clerk's Office; make arrangement for certified copies to be picked up at the Clerk's Office; email communications with Ms. Minor and Ms. Rawls; prepare letter to Mr. Glatz to go with International Federal Express package
11/6/2018	Wallace Lightsey	1.50	\$500.00	\$ 750.00	Emails re service, press inquiries, and other matters; review documents re NWR arbitration claim
11/6/2018	Cathy Bryant	1.90	\$250.00	\$ 475.00	Internet searches for the Department of State authentication division; read instructions related to federal documents being apostilled; prepare Request for Authentication Service; email same to Mr. Winn for review; telephone call to Department of State and listen to apostille requirements
11/7/2018	Marshall Winn	0.80	\$650.00	\$ 520.00	Attention to service of process
11/7/2018	Cathy Bryant	1.00	\$250.00	\$ 250.00	Internet research regarding Apostilled documents; search the U.S. Department of State's website; attempts to contact Dept. of State by telephone; continue searches on the Dept. of State's website
11/8/2018	Wallace Lightsey	0.20	\$500.00	\$ 100.00	Review translation of Krupa Facebook posts; review emails re service issues
11/8/2018	Cathy Bryant	2.90	\$250.00	\$ 725.00	Draft Request for Authentications Service; draft letter to the U.S. Dept. of State enclosing the Request for Authentications Service, two certified copies each of the Amended Complaint, Summons issued to Mr. Pavol and Answers to LR 26.01 Interrogatories and requesting these documents be Apostilled and returned to us; prepare a U.S. Mail, postage paid, return envelope, prepare Fed Ex labels to the U.S. Dept. of State and a Return Label to Wyche
11/9/2018	Cathy Bryant	0.50	\$250.00	\$ 125.00	Document assembly and organization
11/12/2018	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Email communications with Mr. Schapiro; attention to Hague Convention matters
11/13/2018	Marshall Winn	4.20	\$650.00	\$ 2,730.00	Email communications with Mr. Schapiro; email communications with counsel for defendants requesting consent for pro hac vice motions; receive and review motion to dismiss and supporting memorandum; analysis and related communications with counsel re same
11/13/2018	Andrew Bentz	2.50	\$335.00	\$ 837.50	Review complaint and motion to dismiss and communicate with M. Winn and W. Lightsey regarding case.
11/13/2018	Cathy Bryant	0.60	\$250.00	\$ 150.00	Receipt of and save Motions in Support of Pro Hac Vice Applications and supporting documents for Rebecca Jayne Fiebig, Stephen Joseph Obermeier, Mark Bradley Sweet; receipt of and save Crowds on Demand's Answers to Local Rule 26.01 Interrogatories, receipt of and save Adam Swart's Answers to Local Rule 26.01 Interrogatories,
11/14/2018	Marshall Winn	1.20	\$650.00	\$ 780.00	Conferences re response to motion to dismiss; email communications with co-counsel re same; email communications with counsel for defendants Crowds on Demand and Swart; email communications with Czech counsel
11/14/2018	Wallace Lightsey	0.50	\$500.00	\$ 250.00	Review motion to dismiss and supporting memorandum; emails re service; review PHV application for Andrew Bentz
11/14/2018	Andrew Bentz	1.50	\$335.00	\$ 502.50	Edit motion and application for pro hac vice admission; review motion to dismiss and research issues arising from motion.
11/14/2018	Cathy Bryant	2.30	\$250.00	\$ 575.00	Download and save Crowds on Demand's Motion to Dismiss Amended Complaint and Memorandum in Support with Exhibits A - J; download and save Orders Granting Admission Pro Hac Vice of Rebecca Jayne Fiebig, Stephen Joseph Obermeier and Mark Bradley Sweet; draft Application for Admission Pro Hac Vice of Andrew James Montgomery Bentz; email same to Mr. Bentz; revise Application; related document assembly and organization
11/15/2018	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Email communications with co-counsel; miscellaneous planning and preparation for response to motion to dismiss; telephone conference with potential witness; related email communications with co-counsel; email communications with counsel for defendants Crowds on Demand and Swart
11/15/2018	Andrew Bentz	3.50	\$335.00	\$ 1,172.50	Research jurisdiction for response to motion to dismiss; communicate with W. Lightsey and M. Winn and Quinn Emmanuel regarding case strategy.



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Date	Timekeeper	Hours	Rate	Amount	Narrative
11/16/2018	Marshall Winn	5.60	\$650.00	\$ 3,640.00	Email communications with Czech counsel re Hague Convention issues; telephone conference with Ms. Robertson (South Carolina counsel for defendants Swart and CoD) re motion to stay; telephone conference with Messrs Schapiro, Swedlow, Lightsey, et al.; telephone conferences with Mr. Daniel re FBI and US Attorney matters; related follow up; email communications with Mr. Lakin (associate to Mr. Schapiro) re motion to stay
11/16/2018	Wallace Lightsey	1.80	\$500.00	\$ 900.00	Review motion to dismiss and memo in support of same; conference call with co-counsel re response to same
11/19/2018	Wallace Lightsey	0.50	\$500.00	\$ 250.00	Review emails re motion to stay; review information on witness; review additional information and comment on same
11/19/2018	Andrew Bentz	1.80	\$335.00	\$ 603.00	Review research regarding potential stay of proceedings.
11/20/2018	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Attention to motion to stay; related conferences with Chicago counsel; follow up telephone conference with and email communication with opposing counsel re consent; telephone conferences with and email communications with Mr. Daniel
11/20/2018	Wallace Lightsey	0.40	\$500.00	\$ 200.00	Review emails re witness notes and article re stop the thieves website; review motion to stay; continue legal research on alleging defamation under Twombly/Iqbal
11/20/2018	Andrew Bentz	0.50	\$335.00	\$ 167.50	Review motion to stay proceedings.
11/21/2018	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Email communications with Messrs Schapiro et al.; email communications with and telephone conferences with Ms. Robertson re proposed consent motion and order; related follow up; email communications re investigation
11/21/2018	Stacey Wascom	0.90	\$250.00	\$ 225.00	Preparation and filing of Consent Motion for Extension of Time and Proposed Order; communication with Court and all parties regarding same.
11/21/2018	Andrew Bentz	3.50	\$335.00	\$ 1,172.50	Draft opposition to motion to dismiss; review complaint for factual background.
11/23/2018	Marshall Winn	1.30	\$650.00	\$ 845.00	Attention to witness matters; attention to reports of new incriminating evidence
11/26/2018	Marshall Winn	1.10	\$650.00	\$ 715.00	Follow up with co-counsel re motion to stay issues
11/26/2018	Andrew Bentz	4.50	\$335.00	\$ 1,507.50	Research tortious interference issues and draft opposition motion.
11/27/2018	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Follow up with Czech counsel re Hague Convention requirements of Ministry of Justice; conferences with co-counsel re motion to stay
11/27/2018	Andrew Bentz	4.00	\$335.00	\$ 1,340.00	Draft opposition to motion to dismiss; review complaint for factual background; research RICO defenses.
11/27/2018	Cathy Bryant	2.50	\$250.00	\$ 625.00	Receipt and review correspondence from the U.S. Dept. of State returning our paperwork advising U.S. Dept. of Justice has to certify the documents first; telephone conference with Ms. Miller at the U.S. Dept. of Justice regarding requirements to get certified copies; draft correspondence to U.S. Dept. of Justice requesting it certify the documents provided and return to us in the Federal Express package provided; email same to Messrs. Winn and Lightsey for review; prepare Federal Express packages to U.S. Department of Justice with a return label to send the documents back to us; index and hyper-link pleadings
11/28/2018	Andrew Bentz	4.30	\$335.00	\$ 1,440.50	Draft opposition to motion to dismiss; research RICO conspiracy defenses; research jurisdictional issues.
11/29/2018	Marshall Winn	3.80	\$650.00	\$ 2,470.00	Email communications with counsel for Swart and CoD; work on motion to stay; related conferences with co-counsel
11/29/2018	Wallace Lightsey	0.60	\$500.00	\$ 300.00	Email exchanges re motion to stay, investigation
11/29/2018	Andrew Bentz	3.60	\$335.00	\$ 1,206.00	Draft opposition to motion to dismiss; research underlying predicates for RICO claim; edit opposition to motion to dismiss.
11/29/2018	Cathy Bryant	0.50	\$250.00	\$ 125.00	Update Application for Admission Pro Hac Vice; email communications with Mr. Bentz regarding Certificate of Good Standing and Application
11/30/2018	Wallace Lightsey	0.40	\$500.00	\$ 200.00	Review emails re motion to stay and service on Krupa; review motion
11/30/2018	Andrew Bentz	5.50	\$335.00	\$ 1,842.50	Edit opposition to motion to dismiss; research RICO continuity and defamation claim.
11/30/2018	Cathy Bryant	1.30	\$250.00	\$ 325.00	Review and revise motion to stay; email same and communications with Messrs. Bentz, Winn and Lightsey regarding motion to stay; prepare for and file with the Court; calendar deadline for defendants to respond to our motion to stay; download and save filed-stamped copy of same; related communications to counsel

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Date	Timekeeper	Hours	Rate	Amount	Narrative
12/3/2018	Marshall Winn	2.80	\$650.00	\$ 1,820.00	Work on opposition to motion to dismiss; related conferences with co-counsel; attention to witness statement matters
12/3/2018	McKinley H. Hyman	1.40	\$230.00	\$ 322.00	Legal research - Hague Convention
12/3/2018	Cathy Bryant	1.70	\$250.00	\$ 425.00	Prepare Office Services' request form for two Certificates of Good Standing for Mr. Winn from the U.S. District Court; email communications with Mr. Winn and Ms. Hyman; Internet searches of the SC Secretary of State's Office Regarding Apostilles; download information and email same to Ms. Hyman and Mr. Winn
12/4/2018	Marshall Winn	3.90	\$650.00	\$ 2,535.00	Preparation for hearing; related review of facts and Czech matters; conferences with co-counsel
12/4/2018	Wallace Lightsey	5.10	\$500.00	\$ 2,550.00	Conference with Marshall Winn re status conference with Judge Norton; emails re same; review complaint, motion to dismiss, draft by Andrew Bentz re same; legal research re defamation issues; review motion to stay
12/5/2018	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Preparation for and appearance at hearing on motion to stay; related follow up
12/5/2018	Wallace Lightsey	2.90	\$500.00	\$ 1,450.00	Prepare for status conference with Judge Norton; participate in status conference; telephone conference with co-counsel; telephone status conference with Judge Norton; follow up call with co-counsel; review and comment on apostille request form; continue work on opposition to motion to dismiss
12/5/2018	McKinley H. Hyman	3.10	\$230.00	\$ 713.00	Legal research; assess case strategy
12/5/2018	Cathy Bryant	0.80	\$250.00	\$ 200.00	Download, save and review of the Court's Order
12/6/2018	Wallace Lightsey	3.60	\$500.00	\$ 1,800.00	Review court's RICO order; conference with Marshall Winn re same; email Mr. Schapiro re same; continue work on response to motion to dismiss
12/6/2018	McKinley H. Hyman	2.90	\$230.00	\$ 667.00	Strategy regarding Hague service; legal research regarding the same
12/6/2018	Cricket Rawls	0.10	\$205.00	\$ 20.50	Communications with Cathy Bryant regarding obtaining Apostille.
12/6/2018	Cathy Bryant	7.30	\$250.00	\$ 1,825.00	Meeting with Mr. Winn and Ms. McKinley regarding status of service and determine best route moving forward in light of bureaucratic delays; prepare checklist regarding service of process; Internet searches for process server or courier service to handle filing of documents with the U.S. Dept. of Justice and the U.S. Dept. of State; review and download Same Day Process Service webpage; download and save U.S. Dept. of Justice Apostille Website page; prepare Request for Authentication Service-Certificates of Good Standing for Marshall Winn; draft Statement of Marshall Winn
12/7/2018	Marshall Winn	3.60	\$650.00	\$ 2,340.00	Work on response to motion to dismiss; related conferences with co-counsel; attention to Hague Convention matters
12/7/2018	Stephen R. Layne	0.40	\$230.00	\$ 92.00	Begin research re: cases in support of state law defamation claim.
12/7/2018	Cricket Rawls	0.50	\$205.00	\$ 102.50	Edit and finalize documents for Secretary of State; scan and email copy to Marshall Winn and McKinley Hyman; forward original Apostille to Cathy Bryant.
12/7/2018	Cathy Bryant	2.10	\$250.00	\$ 525.00	Numerous telephone communications and email communications with Ms. Bennett, Ms. McKinley and process server
12/10/2018	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Work on response to motion to dismiss; attention to Hague matters; email communications with co-counsel
12/10/2018	McKinley H. Hyman	3.90	\$230.00	\$ 897.00	Legal research - Hague Convention; status report
12/10/2018	Stephen R. Layne	5.90	\$230.00	\$ 1,357.00	Research re: defamation law surrounding the public figure and actual malice issues.
12/11/2018	Marshall Winn	2.50	\$650.00	\$ 1,625.00	Follow up on various Hague Convention matters; attention to motion to dismiss
12/11/2018	McKinley H. Hyman	5.10	\$230.00	\$ 1,173.00	Hague follow-up; legal research
12/11/2018	Stephen R. Layne	0.80	\$230.00	\$ 184.00	Retrieve and compile cited cases on defamation issues of public figure and actual malice.
12/11/2018	Cathy Bryant	1.10	\$250.00	\$ 275.00	Follow-up with process server and Ms. Bennett regarding documents being certified; follow-up with Mr. Bentz regarding application for admission pro hac vice
12/12/2018	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Hague Convention matters; attention to motion to dismiss
12/12/2018	McKinley H. Hyman	4.10	\$230.00	\$ 943.00	Hague follow-up
12/12/2018	Cathy Bryant	1.40	\$250.00	\$ 350.00	Continue work on bureaucratic followup for service on Krupa
12/14/2018	Marshall Winn	3.10	\$650.00	\$ 2,015.00	Development of evidence; service of process matters
12/14/2018	Wallace Lightsey	6.70	\$500.00	\$ 3,350.00	Review and comment on draft press release; legal research re defamation issues on motion to dismiss
12/14/2018	Stephen R. Layne	0.80	\$230.00	\$ 184.00	Conduct additional research on public figure issue.
12/14/2018	Cathy Bryant	1.10	\$250.00	\$ 275.00	Document organization and indexing
12/17/2018	Marshall Winn	1.70	\$650.00	\$ 1,105.00	Drafting opposition to motion to dismiss; Hague convention matters
12/17/2018	Wallace Lightsey	5.20	\$500.00	\$ 2,600.00	Work on defamation portion of opposition to motion to dismiss
12/17/2018	McKinley H. Hyman	0.70	\$230.00	\$ 161.00	Phone and email correspondence regarding service documents at the Department of Justice

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Date	Timekeeper	Hours	Rate	Amount	Narrative
12/17/2018	Stephen R. Layne	4.80	\$230.00	\$ 1,104.00	Continue research re: issue of public figures in foreign jurisdictions and whether they are considered public figures in the United States.
12/18/2018	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Preparation of opposition to motion to dismiss; Hague follow up with associate and paralegal
12/18/2018	McKinley H. Hyman	0.70	\$230.00	\$ 161.00	Phone and email correspondence regarding DOJ service documents
12/19/2018	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Preparation of opposition to motion to dismiss; related communications with co-counsel; Hague matters
12/19/2018	Wallace Lightsey	3.80	\$500.00	\$ 1,900.00	Review and revise draft memo in opposition to motion to dismiss
12/19/2018	McKinley H. Hyman	0.30	\$230.00	\$ 69.00	Email and phone correspondence regarding service of documents
12/20/2018	Wallace Lightsey	3.10	\$500.00	\$ 1,550.00	Review and revise memo in opposition to motion to dismiss; emails with co-counsel re same
12/20/2018	Cathy Bryant	2.30	\$250.00	\$ 575.00	Meeting with Ms. Hyman re Hague followup; telephone conference with the U.S. Dept. of Justice's Office; telephone conference with Ms. Bennett (US DOJ); email communications with Ms. Hyman regarding same
12/21/2018	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Preparation of motion in opposition to motion to dismiss; related correspondence with co-counsel
12/21/2018	Cathy Bryant	0.60	\$250.00	\$ 150.00	Telephone communications with U.S. Dept. of Justice; email communications with Mr. Winn and Ms. Hyman; email communications with Same Day Process Service; calendar to call Ms. Bennett on the 26th; gather pertinent documents follow-up with U.S. Dept. of Justice, U.S. Dept. of State and Same Day Process Service
12/30/2018	Marshall Winn	5.20	\$650.00	\$ 3,380.00	Revisions to opposition to motion to dismiss; email communications with co-counsel
12/31/2018	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Revisions to opposition memorandum; email communications with co-counsel
12/31/2018	Wallace Lightsey	3.30	\$500.00	\$ 1,650.00	Review and revise draft memo in opposition to motion to dismiss
1/2/2019	McKinley H. Hyman	9.10	\$250.00	\$ 2,275.00	Fill out service forms; email correspondence regarding the same; email and phone correspondence regarding service of documents; strategy meeting
1/3/2019	Wallace Lightsey	1.00	\$500.00	\$ 500.00	Email exchange re domicile and investigation; review and comment on revised draft of opposition memo
1/3/2019	McKinley H. Hyman	0.30	\$250.00	\$ 75.00	Phone and email correspondence regarding service of documents
1/3/2019	Cathy Bryant	0.10	\$250.00	\$ 25.00	Email reminder of deadline to file our memorandum is January 4, 2019
1/3/2019	Cathy Bryant	0.40	\$250.00	\$ 100.00	Email communications regarding deadline for filing our opposition memorandum
1/4/2019	Marshall Winn	8.90	\$650.00	\$ 5,785.00	Final revisions and preparation for filing of opposition to motion to dismiss and RICO case statement; related conferences with Mr. Lightsey; telephone conferences with Mr. Schapiro and other Quinn Emanuel counsel
1/4/2019	Wallace Lightsey	7.50	\$650.00	\$ 4,875.00	Email exchange with co-counsel re RICO statement and opposition memorandum; continue review and comment on revisions of memorandum and RICO case statement; conference with Marshall Winn re strategy issues; telephone conference with co-counsel re various matters
1/4/2019	McKinley H. Hyman	1.80	\$250.00	\$ 450.00	Phone and email correspondence regarding service of documents; draft consent motion and accompanying order.
1/4/2019	Cathy Bryant	10.10	\$250.00	\$ 2,525.00	Review and revise RICO Statement; draft consent motion to enlarge page limit and extension of time to file reply; draft proposed order; email same to Ms. Hyman; insert signature block for counsel for Swart and Crowds on Demand into consent motion; prepare for and file consent motion and proposed order with the Court; prepare for and file Memorandum in Support of Motion to Dismiss with the Court
1/5/2019	Wallace Lightsey	2.50	\$650.00	\$ 1,625.00	Emails with co-counsel re filing; final review of consent motion and proposed order on extension of page limits and time, RICO statement, and opposition memorandum
1/7/2019	Marshall Winn	3.50	\$650.00	\$ 2,275.00	Follow up to filing matters; related telephone conferences with and correspondence with clerk of court and opposing counsel; email communications with Mr. Paul
1/7/2019	McKinley H. Hyman	0.90	\$250.00	\$ 225.00	Phone and email correspondence regarding service of documents; strategy regarding service of documents.
1/7/2019	Cathy Bryant	1.40	\$250.00	\$ 350.00	Download and save Consent Motion to Extend Page Limit and Extension of Reply Deadline, Memorandum in Opposition to Motion to Dismiss, Rico Case Statement and Order Granting Motion; email letter to Judge Norton regarding technical issues during filing of opposition memorandum
1/8/2019	McKinley H. Hyman	1.80	\$250.00	\$ 450.00	Phone and email correspondence regarding service documents
1/8/2019	Cathy Bryant	1.50	\$250.00	\$ 375.00	Prepare a binder of Plaintiff's Memorandum in Opposition to Motion to Dismiss for Judge Norton; correspondence to Judge Norton; prepare same for sending to Judge by Federal Express
1/10/2019	McKinley H. Hyman	0.20	\$250.00	\$ 50.00	Email correspondence regarding documents at the Department of State
1/10/2019	Cathy Bryant	0.50	\$250.00	\$ 125.00	Receipt and review of email communications between Ms. Hyman and SDPS
1/11/2019	McKinley H. Hyman	1.50	\$250.00	\$ 375.00	Phone and email correspondence regarding service documents
1/14/2019	Wallace Lightsey	0.80	\$650.00	\$ 520.00	Review amended complaint and motion papers; emails re service

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Date	Timekeeper	Hours	Rate	Amount	Narrative
1/14/2019	McKinley H. Hyman	3.80	\$250.00	\$ 950.00	Draft motion for alternate service and supporting affidavit; email correspondence regarding service documents at the Department of State; legal research
1/14/2019	Cathy Bryant	0.50	\$250.00	\$ 125.00	Draft motion for service of process of Mr. Krupa; email motion to Ms. Hyman
1/15/2019	McKinley H. Hyman	0.70	\$250.00	\$ 175.00	Email correspondence regarding service documents; draft affidavit
1/16/2019	Marshall Winn	0.80	\$650.00	\$ 520.00	Attention to service of process in Slovakia
1/16/2019	McKinley H. Hyman	3.70	\$250.00	\$ 925.00	Review service documents received from Department of State; phone and email correspondence regarding the same
1/16/2019	Cathy Bryant	3.90	\$250.00	\$ 975.00	Meeting with Mr. Winn and Ms. Hyman regarding status of case; telephone conference with the Clerk's Office; draft Summons for Krupa for service in the Slovak Republic; email same to the Clerk for issuance; arrange for the Amended Complaint, Summons and Answers to LR 26.01 Interrogatories to be certified by the DSC; email communications with Same Day Process Service regarding having two additional copies of the pleadings certified by the Dept. of Justice and Apostiled by the Dept. of State; correspondence to Same Day Process providing documents by Federal Express
1/17/2019	Cathy Bryant	0.30	\$250.00	\$ 75.00	Receipt of email confirming Fed Ex package was received by SDPS; email communications with SDPS
1/21/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Receive and review reply memorandum in support of motion for summary judgment filed by counsel for Swart and Crowds On Demand; related email communications with Messrs Paul and Schapiro
1/22/2019	Marshall Winn	1.20	\$650.00	\$ 780.00	Initial review of reply brief of Swart and Crowds; related correspondence with co-counsel
1/22/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review defendants' reply memo on motion to dismiss
1/23/2019	McKinley H. Hyman	2.60	\$250.00	\$ 650.00	Email and phone correspondence regarding certification and apostilling of service documents
1/24/2019	McKinley H. Hyman	0.30	\$250.00	\$ 75.00	Email correspondence regarding service documents
1/28/2019	McKinley H. Hyman	0.70	\$250.00	\$ 175.00	Phone and email correspondence regarding service of documents
1/28/2019	Cathy Bryant	0.30	\$250.00	\$ 75.00	Receipt and review of Notice of Hearing; calendar same; index and hyper-link pleadings
1/29/2019	Marshall Winn	1.40	\$650.00	\$ 910.00	Conferences with co-counsel re pending motion and hearing
1/29/2019	Cathy Bryant	0.10	\$250.00	\$ 25.00	Prepare a binder with the Defendant's Reply in Support of Motion to Dismiss for Mr. Winn
1/30/2019	Andrew Bentz	0.50	\$350.00	\$ 175.00	Review pro hac vice motion and obtain certificate of good standing for motion.
1/31/2019	McKinley H. Hyman	0.30	\$250.00	\$ 75.00	Email and phone correspondence regarding service documents
2/4/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Email communications with Mr. Schapiro re related matters and re hearing on motion to dismiss; attention to pro hac vice motions
2/4/2019	Cathy Bryant	1.80	\$250.00	\$ 450.00	Revise Application for Admission Pro Ha Vice of Carl R. Pennies; draft motion for admission pro ha vice of Carl R. Pennies and proposed Order; email same to Mr. Winn for review and approval; prepare motion, application, certificate of good standing and proposed order for filing; file same with the Court; provide Mr. Winn with pertinent information to send Judge Norton the proposed order by email; receipt, download and save filed-stamped copies of the motion, application, certificate of good standing and proposed order
2/5/2019	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Conferences with opposing local counsel re scheduling; preparation of and submission of related request to Court; receive and review related order; conferences with Mr. Schapiro re preparation for hearing; follow up re service of process under Hague convention
2/5/2019	Cathy Bryant	0.30	\$250.00	\$ 75.00	Download and save notice of rescheduled hearing; re-calendar same; download and save Order granting Carl R. Hennies admission pro hac vice; email motion for admission pro hac vice and supporting documents and order granting same to Mr. Hennies for his information and file
2/6/2019	Marshall Winn	0.80	\$650.00	\$ 520.00	Email communications with Mr. Schapiro; conferences with Mr. Lightsey re preparation for hearing on motion to dismiss
2/6/2019	Cathy Bryant	2.20	\$250.00	\$ 550.00	Receipt of Certificate of Good Standing from DC for Mr. Bentz; revise application for admission pro hac vice of Mr. Bentz and email to him for signature; email motion, application and proposed order to Mr. Winn for his review and approval; revise application for admission pro hac vice and email to Mr. Bentz for his review and approval; prepare for and file motion, application, certificate and proposed order; email proposed order to Judge Norton for his consideration
2/7/2019	Marshall Winn	0.40	\$650.00	\$ 260.00	Attention to motion to dismiss
2/7/2019	Andrew Bentz	0.20	\$350.00	\$ 70.00	Review order granting pro hac vice admission.
2/7/2019	Cathy Bryant	0.10	\$250.00	\$ 25.00	Download and save Order Granting Andrew Bentz Admission Pro Hac Vice
2/8/2019	Cathy Bryant	0.30	\$250.00	\$ 75.00	Email communications with Mike at Same Day Process Service; prepare Federal Express label and email to Mike to use in returning the apostilled documents to us
2/11/2019	McKinley H. Hyman	1.70	\$250.00	\$ 425.00	Review apostilled documents; phone and mail correspondence regarding service of documents

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Date	Timekeeper	Hours	Rate	Amount	Narrative
2/11/2019	Cathy Bryant	2.50	\$250.00	\$ 625.00	Receipt of Apostilled documents; review same with Ms. Hyman; make copies and provide originals to Ms. Minor to send by federal express to Mr. Glatz; update caption to reflect Mr. Bentz being admitted pro hac vice; obtain invoices from Same Day Process Service; summarize services and fees of SDPS; email invoices and summary to Mr. Winn and Ms.
2/13/2019	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Follow up re Hague service; preparation for hearing; response to Court inquiry re status of Hague service upon Krupa; related email communications with Messrs Schapiro et al.
2/13/2019	McKinley H. Hyman	0.60	\$250.00	\$ 150.00	Email correspondence regarding status of service upon Krupa
2/13/2019	Andrew Bentz	0.20	\$350.00	\$ 70.00	Communicate with M. Winn and W. Lightsey regarding court request for update.
2/14/2019	Marshall Winn	1.50	\$650.00	\$ 975.00	Follow up on factual development; conference with Mr. Lightsey re legal issues
2/15/2019	Marshall Winn	2.30	\$650.00	\$ 1,495.00	Correspondence and telephone conference with Mr. Paul re new factual developments; legal conference with Messrs Schapiro et al re new factual developments; related legal analysis and further conferences with Messrs Schapiro and Lightsey
2/15/2019	Wallace Lightsey	0.90	\$650.00	\$ 585.00	Telephone conference with Andy Schapiro, David Paul, and Marshall Winn; conference with Marshall Winn re follow up and related matters
2/15/2019	Andrew Bentz	1.00	\$350.00	\$ 350.00	Communicate with W. Lightsey and co-counsel regarding hearing and recent federal decision regarding racketeering lawsuit; review recent decision.
2/18/2019	Cathy Bryant	0.60	\$250.00	\$ 150.00	Prepare hard copy file; organize documents into same
2/26/2019	Marshall Winn	3.90	\$650.00	\$ 2,535.00	Draft and revise supplemental RICO case statement and related motion to supplement RICO case statement; related telephone conferences with Mr. Schapiro; telephone conference with and email communications with opposing counsel re objection vel non; attention to filing
2/26/2019	Andrew Bentz	1.00	\$350.00	\$ 350.00	Review Supplemental case statement; review comments from co-counsel and M. Winn regarding statement.
2/26/2019	Cathy Bryant	0.80	\$250.00	\$ 200.00	Review and revise Motion to Supplement Rico Case Statement and Supplement to Rico Case Statement; prepare for and file same with the Court
2/27/2019	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Preparation for hearing; follow up re service of process status; receive and review opposition memorandum re motion to supplement RICO case statement; related conferences with Mr. Schapiro
2/27/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review motion to supplement and proposed supplemental RICO case statement
2/27/2019	McKinley H. Hyman	4.10	\$250.00	\$ 1,025.00	Prepare for hearing
2/27/2019	Cathy Bryant	0.80	\$250.00	\$ 200.00	Prepare Hague Service Timeline for Ms. Hyman; download and save Defendants' Response in Opposition to Motion to Supplement Rico Statement; calendar deadline to file Reply
2/28/2019	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Draft and revision of reply brief; attention to filing and service; related conferences with Mr. Lightsey, Messrs Schapiro et al.
2/28/2019	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review and comment on supplemental RICO case statement and motion re same; emails with co-counsel re same
2/28/2019	McKinley H. Hyman	4.40	\$250.00	\$ 1,100.00	Prepare for hearing
2/28/2019	Andrew Bentz	0.80	\$350.00	\$ 280.00	Review reply to motion to dismiss and comments from co-counsel and W. Lightsey.
2/28/2019	Cathy Bryant	2.50	\$250.00	\$ 625.00	Review and revise Reply in Support of Motion to Supplement Rico Case Statement; scan Declaration of Marshall Winn and pdf same in preparation for filing with the Court; prepare for and file Reply and Declaration with the Court; email same to Mr. Winn, Mr. Lightsey and Mr. Bentz for their information; download and save the Court's amended notice of hearing to include Motion to Supplement Rico Statement to the motion hearing scheduled for March 6; calendar same; prepare binder for upcoming hearing on pending motions for Mr. Winn; meeting with Ms. McKinley regarding additional documents to be indexed and included within Mr. Winn's hearing binder
3/1/2019	Marshall Winn	3.10	\$650.00	\$ 2,015.00	Review materials in preparation for hearing on motion to dismiss; follow up on service of process
3/1/2019	McKinley H. Hyman	1.70	\$250.00	\$ 425.00	Prepare for hearing
3/1/2019	Andrew Bentz	1.00	\$350.00	\$ 350.00	Review reply brief, D. Paul comments, and A. Schapiro comments; communicate with co-counsel ahead of hearing.
3/2/2019	Marshall Winn	3.40	\$650.00	\$ 2,210.00	Preparation for hearing; email communications with Czech counsel re service of process
3/3/2019	Marshall Winn	3.10	\$650.00	\$ 2,015.00	Preparation for hearing
3/4/2019	Marshall Winn	7.10	\$650.00	\$ 4,615.00	Preparation for hearing; related email communications with Czech counsel, Mr. Schapiro, et al.
3/4/2019	McKinley H. Hyman	1.20	\$250.00	\$ 300.00	Prepare for hearing
3/4/2019	Andrew Bentz	0.70	\$350.00	\$ 245.00	Communicate with co-counsel ahead of hearing; review service documents



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Date	Timekeeper	Hours	Rate	Amount	Narrative
3/4/2019	Cathy Bryant	1.80	\$250.00	\$ 450.00	Update binder for Mr. Winn for upcoming hearing with Original Translated Summons; update binder for Mr. Winn with timeline; prepare binder of memoranda in support of motions to be heard on March 6, 2019 for Mr. Lightsey
3/5/2019	Marshall Winn	14.00	\$650.00	\$ 9,100.00	Preparation for hearing on motion to dismiss; conferences with Messrs Lightsey, Schapiro, Hennies re preparation for hearing
3/5/2019	Wallace Lightsey	7.00	\$650.00	\$ 4,550.00	Travel to Charleston; conference with Marshall Winn; review motion papers; conference with Marshall Winn, Andy Schapiro, and Carl Hennies
3/5/2019	McKinley H. Hyman	0.60	\$250.00	\$ 150.00	Prepare for hearing
3/5/2019	Cricket Rawls	0.40	\$220.00	\$ 88.00	Communications with Marshall Winn and McKinley Hyman regarding documents for hearing; finalize documents and forward copies to Cathy Bryant.
3/5/2019	Andrew Bentz	0.50	\$350.00	\$ 175.00	Communicate with co-counsel ahead of hearing; review service documents.
3/5/2019	Cathy Bryant	0.60	\$250.00	\$ 150.00	Receipt of Communications regarding confirmation of service of process on Pavol Krupa on February 27, 2019; update pleading index and hyper-link documents to same
3/6/2019	Marshall Winn	9.00	\$650.00	\$ 5,850.00	Preparation for and appearance at hearing on motion to dismiss; conferences with opposing counsel; conference with Mr. Daniel re related matter; email communications with judicial law clerk and all counsel re forum non conveniens and diversity jurisdiction issues; client communications and memoranda
3/6/2019	Wallace Lightsey	10.00	\$650.00	\$ 6,500.00	Prepare for hearing; attend hearing; follow up conference with co-counsel; return to Greenville; review email from law clerk and conference with Marshall Winn re response
3/6/2019	Andrew Bentz	0.50	\$350.00	\$ 175.00	Communicate with co-counsel and M. Winn regarding hearing.
3/7/2019	Marshall Winn	1.70	\$650.00	\$ 1,105.00	Conferences with client; email communications with co-counsel
3/7/2019	McKinley H. Hyman	0.50	\$250.00	\$ 125.00	Hearing assessment
3/7/2019	Andrew Bentz	0.80	\$350.00	\$ 280.00	Communicate with M. Winn regarding hearing; review summary of hearing.
3/8/2019	Marshall Winn	1.30	\$650.00	\$ 845.00	Follow up re preliminary discussions as to defense conflict; related email communications with co-counsel
3/8/2019	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Email exchange re Wiley Rein representation of Krupa and Swart
3/8/2019	Cathy Bryant	1.20	\$250.00	\$ 300.00	Organize documents and re-assemble into file after preparation for upcoming hearing; receipt of proof of service of process on Krupa; draft notice of filing of proof of service; prepare for and file same with the Court
3/10/2019	Marshall Winn	1.20	\$650.00	\$ 780.00	Draft proposed letter to counsel for Swart and Crowds re resolution; email communications with Mr. Schapiro
3/10/2019	Andrew Bentz	0.50	\$350.00	\$ 175.00	Review settlement offer; communicate with co-counsel and M. Winn regarding settlement offer.
3/11/2019	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Email communications with counsel for co-defendants Swart and Crowds re follow up to court's direction re limited jurisdictional discovery and related matters; email communications with Mr. Schapiro et al.; miscellaneous related matters
3/11/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and respond to email from Marshall Winn re formal settlement offer to Swart
3/11/2019	Cathy Bryant	0.20	\$250.00	\$ 50.00	Email court reporter requesting transcript from the hearing held before Judge Norton on March 6, 2019
3/12/2019	Marshall Winn	3.20	\$650.00	\$ 2,080.00	Conference with Mr. Lightsey re jurisdictional discovery and related matters; telephone conferences with co-counsel; telephone conference with opposing counsel re their proposed jurisdictional discovery procedure and scheduling; related follow up with client; receive and review transcript of hearing on motion to dismiss
3/12/2019	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Conference with Marshall Winn; emails re jurisdictional discovery; conference call with Andy Schapiro re same; conference call with opposing counsel (with Marshall Winn and Andy Schapiro); review emails re domicile and tax issues
3/12/2019	Matthew W. Couvillion	0.50	\$450.00	\$ 225.00	Initial research on residency issue for SC tax purposes.
3/13/2019	Marshall Winn	2.20	\$650.00	\$ 1,430.00	Conference with Mr. Paul re jurisdictional facts; review materials re domicile; related legal research; email communications with opposing counsel re proposed scheduling order; related conferences with co-counsel; further communications with opposing counsel in agreement on motion and proposed order
3/13/2019	Wallace Lightsey	3.00	\$650.00	\$ 1,950.00	Review information on Mr. Bakala travel days; legal research re domicile for diversity jurisdiction; conference with Marshall Winn re same
3/14/2019	Andrew Bentz	0.30	\$350.00	\$ 105.00	Review proposed orders from opposing counsel.
3/14/2019	Cathy Bryant	1.60	\$250.00	\$ 400.00	Receipt, review, download and save Consent Motion for a Discovery Schedule and proposed Order; receipt, review, download and save Consent Motion for Extension to File Answer to Amended Complaint and proposed Order; receipt, review, download and save Orders Granting Consent Motions; calendar deadlines
3/19/2019	Marshall Winn	1.10	\$650.00	\$ 715.00	Receive and review additional evidence from potential witness; conference with Mr. Lightsey
3/20/2019	Matthew W. Couvillion	1.40	\$450.00	\$ 630.00	Tax research on SC residence status.



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Date	Timekeeper	Hours	Rate	Amount	Narrative
3/22/2019	Marshall Winn	1.40	\$650.00	\$ 910.00	Correspondence with counsel for plaintiff; receive and review interrogatories from plaintiff; conference with Mr. Lightsey
3/22/2019	Matthew W. Couvillion	2.20	\$450.00	\$ 990.00	Research on SC residency for tax purposes.
3/22/2019	Cathy Bryant	0.40	\$250.00	\$ 100.00	Email communications with Mr. Winn regarding deadline for defendants' to serve Residency Discovery Requests; update pleading index and hyper-link recent pleadings to same
3/26/2019	Matthew W. Couvillion	0.80	\$450.00	\$ 360.00	Tax research on SC residency issue; confer with M. Silliman.
3/28/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Email communications with Quinn Emanuel counsel; review and comment on proposed stipulation and protective order
3/28/2019	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Review and comment on draft protective order; emails with co-counsel re same
3/28/2019	Matthew W. Couvillion	1.00	\$450.00	\$ 450.00	Tax research regarding SC residency; confer with M. Silliman.
3/28/2019	Meredith Silliman	2.90	\$250.00	\$ 725.00	Research South Carolina individual income tax determinations (both the Code and related Regulations but also Department of Revenue guidance) per M. Couvillion; prepare first draft of summary of findings along with links to primary sources for M. Couvillion's review and revision.
3/29/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Further review and comment on draft protective order and revision of same
3/30/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review revision of draft protective order; emails re same
4/2/2019	Marshall Winn	1.60	\$650.00	\$ 1,040.00	Preparation of proposed stipulation and protective order; related email communications with Quinn Emanuel counsel; email communication with counsel for defendant
4/3/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Finalization of draft stipulation and protective order; email communication with opposing counsel re same
4/3/2019	Matthew W. Couvillion	0.50	\$450.00	\$ 225.00	Confer with M. Winn; review memo.
4/4/2019	Marshall Winn	0.30	\$650.00	\$ 195.00	Email communications with opposing counsel re draft stipulation and protective order
4/10/2019	Wallace Lightsey	0.80	\$650.00	\$ 520.00	Review discovery requests; conference with Marshall Winn re same; telephone conference with co-counsel re same
4/11/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and comment on proposed changes to protective order
4/16/2019	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Preparation of responses to discovery requests
4/16/2019	Cathy Bryant	0.40	\$250.00	\$ 100.00	Meeting with Ms. Hood; provide her with information on all counsel of record
4/17/2019	Marshall Winn	1.10	\$650.00	\$ 715.00	Preparation of responses to discovery requests
4/18/2019	Marshall Winn	3.70	\$650.00	\$ 2,405.00	Preparation of responses to discovery requests; draft letter to opposition counsel re protective order; related correspondence with Mr. Schapiro et al.; draft letter to counsel for defendants re protective order
4/18/2019	Wallace Lightsey	2.20	\$650.00	\$ 1,430.00	Review and comment on defense changes to protective order terms; review discovery requests and comment on responses and objections
4/19/2019	Marshall Winn	3.70	\$650.00	\$ 2,405.00	Preparation of discovery responses; related communication with associated counsel
4/19/2019	Wallace Lightsey	0.90	\$650.00	\$ 585.00	Review and respond to emails re letter to opposing counsel re protective order, email from opposing counsel, and response to same; conference call with co-counsel re same
4/20/2019	Marshall Winn	4.10	\$650.00	\$ 2,665.00	Preparation of discovery responses; related communication with associated counsel
4/21/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Preparation of discovery responses; related communication with associated counsel
4/22/2019	Marshall Winn	6.60	\$650.00	\$ 4,290.00	Preparation of responses to discovery requests; related conferences with associated counsel
4/22/2019	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review draft interrogatory answers and response to requests for production, email exchange re protective order
4/23/2019	Marshall Winn	1.50	\$650.00	\$ 975.00	Receive and review additional documentation; email communications with client re discovery
4/23/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review letter from opposing counsel re protective order; emails re meet and confer
4/24/2019	Marshall Winn	3.10	\$650.00	\$ 2,015.00	Conferences with Quinn Emanuel co-counsel re discovery issues; conference with counsel for Krupa and Swart/Crowds on Demand re protective order (formal meet and confer prerequisite to court hearing); related matters
4/24/2019	Wallace Lightsey	2.20	\$650.00	\$ 1,430.00	Review defendant's proposed changes to protective order; review correspondence re same and prepare for meet and confer; conference call with co-counsel and defense counsel; follow up on same
4/26/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and edit notice of filing and emails with Cathy Bryant re same
4/30/2019	Wallace Lightsey	1.80	\$650.00	\$ 1,170.00	Review and comment on Czech court decision; review translation of decision; telephone conference with Marshall Winn re overture from Krupa
5/1/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Conferences with Mr. Lightsey and Ms. Anna re responses to requests for production; email communications with Quinn Emanuel counsel re comments and revisions to revised draft protective order; receive and review correspondence from opposing counsel re discovery responses
5/1/2019	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Review and comment on revisions to proposed protective order; meet with Marshall Winn and Rachael Anna to discuss document production; review deficiency letter from opposing counsel

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Date	Timekeeper	Hours	Rate	Amount	Narrative
5/1/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Meeting with Mr. Winn and Mr. Lightsey to discuss status of jurisdictional discovery and action items needed prior to production deadline and review discovery related documents.
5/2/2019	Rachael L. Anna	1.90	\$450.00	\$ 855.00	Review opposition to motion to dismiss, discovery responses, and charts regarding information needed for discovery.
5/3/2019	Rachael L. Anna	1.00	\$450.00	\$ 450.00	Review opposition to motion to dismiss, discovery responses, and charts regarding information needed for discovery.
5/6/2019	Marshall Winn	1.10	\$650.00	\$ 715.00	Attention to jurisdictional discovery matters; related correspondence with Mr. Schapiro
5/6/2019	Rachael L. Anna	1.00	\$450.00	\$ 450.00	Review discovery responses and prepare list of items needed for responding to discovery for review by Mr. Winn.
5/8/2019	Marshall Winn	4.70	\$650.00	\$ 3,055.00	Attention to responses to request for production; related correspondence with Mr. Bakala; related correspondence with Messrs Schapiro et al.; conferences with Mr. Lightsey and Ms. Anna
5/8/2019	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Confer with Mr. Winn regarding information and documents needed for discovery; review proposed correspondence in response to defendants' objections to discovery responses and related analysis from the Quinn Emanuel team; review documents from Mr. Winn for purposes of responding to requests for production of documents.
5/9/2019	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Review documents re responses to discovery requests; related correspondence with co-counsel; correspondence with opposing counsel re discovery dispute and conference to resolve
5/9/2019	Rachael L. Anna	2.20	\$450.00	\$ 990.00	Confer with Mr. Winn and Quinn Emanuel team regarding meet and confer conference; confer with Ms. Minor regarding information needed for discovery; review documents and information collected by Mr. Winn for purposes of responding to defendants' requests for production of documents and interrogatory requests.
5/10/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Ms. Minor regarding documents collected for discovery.
5/12/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review opposition edits to draft protective order; review email from Margaret Haas re same; prior emails re discovery
5/13/2019	Wallace Lightsey	0.80	\$650.00	\$ 520.00	Emails re discovery issues, meet and confer with opposing counsel; review discovery responses and issues; review protective order
5/13/2019	Rachael L. Anna	2.50	\$450.00	\$ 1,125.00	Search for and prepare documents and information in response to jurisdictional discovery requests served by Krupa; confer with Quinn Emanuel team regarding supplemental interrogatory responses and documents to be produced; confer with Ms. Minor regarding documents collected to date for discovery.
5/14/2019	Marshall Winn	4.20	\$650.00	\$ 2,730.00	Email communications with Mr. Bakala re discovery matters; conference with Mr. Schapiro et al. re discovery issues; "meet-and-confer" conference with counsel for Krupa et al. re discovery issues; related follow up
5/14/2019	Wallace Lightsey	1.90	\$650.00	\$ 1,235.00	Prepare for meet and confer on discovery issues; conference with opposing counsel re same
5/14/2019	Rachael L. Anna	2.40	\$450.00	\$ 1,080.00	Meet and confer conference with opposing counsel regarding protective order and discovery; meeting with Mr. Robertson to discuss document production and confidentiality issues associated with production of information; review documents and information in response to jurisdictional discovery requests served by Krupa; confer with Ms. Minor regarding documents collected to date for discovery.
5/14/2019	Larry Roberson	0.20	\$225.00	\$ 45.00	Conference with Ms. Anna in connection with planning for upcoming client document production
5/15/2019	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Follow up on responses to discovery requests; related email communications with co-counsel and review of documents
5/15/2019	Rachael L. Anna	2.90	\$450.00	\$ 1,305.00	Confer with Mr. Roberson regarding document production; confer with Mr. Lightsey, Mr. Winn, and Quinn Emanuel team regarding confidentiality designations for documents; confer with Mr. Winn regarding information and documents needed for discovery; confer with Quinn Emanuel team regarding document production formatting issues; review documents collected for discovery.
5/16/2019	Marshall Winn	3.80	\$650.00	\$ 2,470.00	Attention to discovery matters: review documents; conferences with Ms. Anna re preparation of documents in response to request for production; email communications with co-counsel; preparation of correspondence to counsel for defendants re protective order
5/16/2019	Rachael L. Anna	3.60	\$450.00	\$ 1,620.00	Telephone conference with Ms. Haas (Quinn Emanuel) regarding discovery issues; confer with Mr. Winn, Mr. Lightsey, and Quinn Emanuel team regarding various discovery and protective order issues; confer with Mr. Roberson regarding management of documents in review platform; review documents collected for discovery; prepare information to supplement interrogatory responses.
5/16/2019	Larry Roberson	0.40	\$225.00	\$ 90.00	Facilitate establishment of electronic document review repository; Examine client documents in connection with document review; Communicate with Ms. Anna re: the same
5/17/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Email exchanges with co-counsel re motion to compel, protective order, and redaction of tax returns

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Date	Timekeeper	Hours	Rate	Amount	Narrative
5/17/2019	Rachael L. Anna	5.50	\$450.00	\$ 2,475.00	Review documents to produce for jurisdictional discovery and redact all confidential information; confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding confidentiality issues; confer with Mr. Roberson regarding confidentiality designations and preparation of document production issues.
5/17/2019	Larry Roberson	0.20	\$225.00	\$ 45.00	Email communication with R. Anna re: redactions and document tagging in connection with request for production of documents
5/19/2019	Rachael L. Anna	1.50	\$450.00	\$ 675.00	Review confidentiality redactions and designations in document production.
5/20/2019	Marshall Winn	2.50	\$650.00	\$ 1,625.00	Attention to identification of documents for production; related conferences with colleagues; preparation and service of supplemental responses to defendants' interrogatories; related correspondence
5/20/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and comment on supplemental responses to interrogatories; emails re protective order and motion to compel with co-counsel
5/20/2019	Rachael L. Anna	4.80	\$450.00	\$ 2,160.00	Review interrogatory responses with Mr. Winn; review document production including confidentiality issues; telephone conference with Ms. Haas (Quinn Emanuel) regarding document production and supplementing interrogatory responses; provide instructions to L. Roberson regarding documents identified for production; circulate document production with Quinn Emanuel team; update Quinn Emanuel team regarding information to supplement in interrogatory responses and confidentiality designations and confer with Quinn Emanuel team regarding same.
5/20/2019	Larry Roberson	0.30	\$225.00	\$ 67.50	Examine client documents in connection with request for production of documents; Communicate with R. Anna re: the same
5/21/2019	Wallace Lightsey	1.60	\$650.00	\$ 1,040.00	Emails re discovery and motion to compel; review revised discovery responses
5/21/2019	Wallace Lightsey	1.60	\$650.00	\$ 1,040.00	Review motion to compel; review QE's legal memo on forum non conveniens
5/21/2019	Rachael L. Anna	4.20	\$450.00	\$ 1,890.00	Provide instructions to Mr. Roberson regarding document production and confer with Mr. Roberson regarding same; review document production including redactions of confidential information; confer with Quinn Emanuel team regarding document production; prepare correspondence to opposing counsel regarding production of documents and confidentiality issues; serve verification of supplemental interrogatory responses; confer with Mr. Winn regarding verification; review defendants' motion to compel discovery.
5/21/2019	Larry Roberson	1.40	\$225.00	\$ 315.00	Analyze client documents in connection with request for production of documents; Communicate with R. Anna re: the same
5/21/2019	Stacey Wascom	0.70	\$250.00	\$ 175.00	Receipt and review of Adam Swart and Crowd on Demand's Motion to Compel; communication with counsel regarding same.
5/30/2019	Marshall Winn	4.90	\$650.00	\$ 3,185.00	Attention to discovery matters: revisions to draft memorandum in opposition to motion to compel; related email communications with Mr. Schapiro and Ms. Haas
5/30/2019	Rachael L. Anna	5.20	\$450.00	\$ 2,340.00	Review opposition to motion to compel and provide comments and edits to draft; review legal authority related to jurisdiction issues; confer with Ms. Wascom regarding notice of appearance and review for filing; review corporate entity agreements with Mr. Larson for purposes of citing information in opposition to motion to compel; confer with Mr. Graben regarding corporate entities.
5/30/2019	Stacey Wascom	1.90	\$250.00	\$ 475.00	Preparation and filing of Notice of Appearance for Rachael Anna.
5/31/2019	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Attention to discovery matters; related conferences with Ms. Anna and Mr. Schapiro et al.
5/31/2019	Wallace Lightsey	1.50	\$650.00	\$ 975.00	Review emails re protective order and email co-counsel re thoughts on same; review QE memo on forum non conveniens; review defense motion to compel; review and comment on draft response to same
5/31/2019	Eric Graben	0.50	\$450.00	\$ 225.00	Research information re Bakala-related entities.
5/31/2019	Matthew W. Couvillion	1.10	\$450.00	\$ 495.00	Call with SCDOR counsel regarding tax issue; confer with M. Winn on same.
5/31/2019	Rachael L. Anna	3.70	\$450.00	\$ 1,665.00	Review document production to identify correct cites for opposition to motion to compel and confer with Quinn Emanuel team regarding same; review bank statements and other documents potentially for production; confer with Quinn Emanuel team regarding review of information related to opposition brief and defendants' discovery request; confer with Mr. Roberson regarding loading documents into electronic discovery platform to review for production.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
5/31/2019	Larry Roberson	0.20	\$225.00	\$ 45.00	Examine client documents in connection with document review; Communicate with R. Anna re: the same
6/1/2019	Marshall Winn	4.60	\$650.00	\$ 2,990.00	Conferences with Ms. Anna; work on discovery matters; revisions to draft memorandum in opposition to motion to dismiss; related email communications with co-counsel
6/1/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Prepare items to be addressed for opposition brief for review by Mr. Winn and confer with Mr. Winn regarding same.
6/2/2019	Marshall Winn	5.30	\$650.00	\$ 3,445.00	Conference with Ms. Anna re discovery issues and open items; prepare draft declaration of M. Winn; draft additional revisions to memorandum in opposition to motion to dismiss; related email communications with co-counsel
6/2/2019	Rachael L. Anna	2.30	\$450.00	\$ 1,035.00	Telephone conference with Mr. Winn regarding information needed for preparation of opposition to motion to compel; telephone conference with Ms. Haas (Quinn Emanuel) regarding opposition to motion to compel; prepare opposition to motion to compel.
6/3/2019	Marshall Winn	5.20	\$650.00	\$ 3,380.00	Final drafting and revisions to memorandum in opposition to motion to dismiss; drafting declaration; preparation and review of exhibits; attention to filing; related email communications with co-counsel and telephone conference with Mr.
6/3/2019	Wallace Lightsey	3.70	\$650.00	\$ 2,405.00	Review motion to compel; review and comment on draft brief in opposition to motion to compel; review and comment on draft Winn declaration; further email exchanges with co-counsel re same
6/3/2019	Rachael L. Anna	9.10	\$450.00	\$ 4,095.00	Telephone conference and meetings with Mr. Winn and Mr. Lightsey regarding opposition to motion to compel; meetings with Ms. Wascom and Ms. Rawls regarding preparation of exhibits and opposition to motion to compel; confer with Mr. Schapiro, Mr. Lakin, and Ms. Haas; prepare affidavit to opposition brief and other exhibits; revise opposition to motion to compel and prepare opposition and exhibits for filing.
6/3/2019	Cricket Rawls	0.80	\$250.00	\$ 200.00	Communications with Stacey Wascom regarding procedures for filing sealed exhibits and Motion to Seal; communications with Rachael Anna regarding Motion to Seal to be filed and procedures for emailing to Judge unredacted briefs and exhibits requesting to be filed under seal.
6/3/2019	Stacey Wascom	4.30	\$250.00	\$ 1,075.00	Preparation and filing of Memo in Opposition to Motion to Compel, exhibits under seal and communication with court and counsel regarding same.
6/4/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review final version of memo in opposition to motion to compel
6/4/2019	Rachael L. Anna	2.70	\$450.00	\$ 1,215.00	Review correspondence from court regarding information supplemental information needed for filing; confer with and assist Ms. Rawls regarding preparing supplemental information requested by court; review letter to court with supplemental information; review and prepare documents for supplemental production in response to jurisdictional
6/4/2019	Cricket Rawls	2.30	\$250.00	\$ 575.00	Communications with Rachael Anna regarding request from court regarding filing; edit exhibit slips sheets; conference with James Bryan in Clerk's office regarding event filing; finalize documents and file with court; conference with clerk regarding Clerk's editing the filing date to original filing data, and request for courtesy copy; prepare courtesy copy of Memo in Opposition with unredacted portions of memo and full exhibits pending under Motion to Seal; draft letter to judge forwarding courtesy copy and email copy of letter to all counsel of record.
6/5/2019	Marshall Winn	1.10	\$650.00	\$ 715.00	Attention to discovery matters and related follow up with Messrs Schapiro et al.
6/5/2019	Rachael L. Anna	2.60	\$450.00	\$ 1,170.00	Review and prepare documents for supplemental production in response to jurisdictional discovery.
6/5/2019	Cricket Rawls	0.30	\$250.00	\$ 75.00	Communications with Stacey Wascom regarding Order granting Motion to Seal and filing sealed document with the Court.
6/5/2019	Stacey Wascom	1.50	\$250.00	\$ 375.00	Receipt and review of Order granting Motion to Seal; preparation and filing of exhibits under seal.
6/6/2019	Marshall Winn	0.60	\$650.00	\$ 390.00	Attention to follow up to court filings
6/6/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Meeting with S.Wascom to review information requiring redactions in supplemental document production for jurisdictional discovery.
6/6/2019	Rachael L. Anna	1.90	\$450.00	\$ 855.00	Review and prepare documents for supplemental production in response to jurisdictional discovery.
6/6/2019	Stacey Wascom	2.10	\$250.00	\$ 525.00	Communication with the court and counsel regarding filing of Notice of Filing exhibits.
6/7/2019	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Attention to court inquiries; receive and review notice of scheduling of hearing on defendants' motion to dismiss; related conferences with Mr. Lightsey and Ms. Anna and email communications with Mr. Schapiro
6/7/2019	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Confer with Ms. Rawls regarding issue related to court filing; confer with Ms. Wascom regarding preparation of supplemental production; confer with Mr. Winn regarding preparation for court hearing; review and prepare documents for supplemental production in response to jurisdictional discovery.
6/10/2019	Marshall Winn	2.80	\$650.00	\$ 1,820.00	Procedural matters re defendants' request for postponement of hearing on their motion to compel; receive and review defendants' reply in support to their motion to compel; related email communications with co-counsel

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Date	Timekeeper	Hours	Rate	Amount	Narrative
6/10/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails re scheduling of motion hearing; conference with Marshall Winn and Rachael Anna re same; telephone conference with Andy Schapiro re same
6/10/2019	Rachael L. Anna	5.90	\$450.00	\$ 2,655.00	Prepare supplemental production in response to jurisdictional discovery and QC production; prepare letter to opposing counsel regarding supplemental production.
6/10/2019	Larry Roberson	1.20	\$225.00	\$ 270.00	Analyze client documents in connection with request for production of documents; Communicate with R. Anna re: the same
6/10/2019	Stacey Wascom	0.80	\$250.00	\$ 200.00	Receipt and review of Crowds on Demand's Reply Memo; preparation of cover letter to counsel for service of document production.
6/11/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review proposed motion for continuance of motion hearing; emails re same
6/11/2019	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Meeting with Ms. Davis to review information needed for court hearing; review Plaintiffs' reply brief to opposition to motion to compel.
6/11/2019	Sarah Davis	3.00	\$220.00	\$ 660.00	Review and analyze document production and draft spreadsheet of financial transactions in preparation of hearing on Jurisdiction
6/12/2019	Marshall Winn	0.70	\$650.00	\$ 455.00	Preparation for hearing; related review of documents
6/12/2019	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Confer with Mr. Lakin regarding filing motion for protective order; confer with Ms. Davis regarding preparing template for motion for protective order; review prior correspondence between counsel for parties regarding protective order.
6/12/2019	Sarah Davis	5.00	\$220.00	\$ 1,100.00	Continue review and analysis of document production and preparation of spreadsheet listing financial transactions in preparation of hearing on Jurisdiction
6/12/2019	Sarah Davis	0.30	\$220.00	\$ 66.00	Download and review case filings and transmit to attorneys for review
6/12/2019	Sarah Davis	1.00	\$220.00	\$ 220.00	Draft and revise Consent Motion for Protective Order
6/13/2019	Marshall Winn	1.30	\$650.00	\$ 845.00	Preparation for hearing; telephone conference with court re defendants' motion to reschedule hearing; related email communications with co-counsel; receive and review related court order
6/13/2019	Rachael L. Anna	2.00	\$450.00	\$ 900.00	Review court order to produce unredacted documents and meet with Ms. Davis and Mr. Roberson regarding same; confer with Mr. Winn and Quinn Emanuel team regarding compliance with court request; review protective order and draft consent motion for protective order.
6/13/2019	Sarah Davis	0.20	\$220.00	\$ 44.00	Attend inter-office conference with R. Anna and L. Roberson regarding plan for production of documents for in-camera review
6/13/2019	Sarah Davis	2.00	\$220.00	\$ 440.00	Continue review and analysis of document production and preparation of spreadsheet listing financial transactions in preparation of hearing on Jurisdiction
6/13/2019	Sarah Davis	1.00	\$220.00	\$ 220.00	Download and review case filings including Text Order Granting Motion to Continue and Notice of Rescheduling Hearing; Docket new Hearing date for case team
6/14/2019	Marshall Winn	1.30	\$650.00	\$ 845.00	Miscellaneous matters; telephone conference with client re status report
6/14/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on draft motion for entry of protective order and final version of proposed protective order; emails re same
6/14/2019	Rachael L. Anna	3.10	\$450.00	\$ 1,395.00	Confer with Ms. Davis and Mr. Roberson regarding document production; review unredacted materials requested by court and letter to court; revise index to documents; confer with Mr. Winn, Mr. Lightsey, Mr. Schapiro, and Mr. Lakin regarding protective order and consent motion for protective order; correspond with opposing counsel regarding protective order and consent motion for protective order.
6/14/2019	Larry Roberson	0.60	\$225.00	\$ 135.00	Analyze InCamera document production in connection with production of documents; Communicate with R. Anna re: the same; Office conference with S. Davis re: client production
6/14/2019	Sarah Davis	2.50	\$220.00	\$ 550.00	Prepare document production to be sent for delivery via Federal Express to Judge's Chambers for in-camera review
6/14/2019	Sarah Davis	0.30	\$220.00	\$ 66.00	Draft and prepare cover letter enclosing document production for in-camera review
6/17/2019	Marshall Winn	0.50	\$650.00	\$ 325.00	Email communications with and telephone conference with Mr. Schapiro re replacement of opposing counsel; related follow up

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Date	Timekeeper	Hours	Rate	Amount	Narrative
6/17/2019	Rachael L. Anna	0.90	\$450.00	\$ 405.00	Confer with Mr. Lakin regarding compliance with court request for unredacted production; review delivery confirmation and confer with Quinn Emanuel team regarding same; confer with Mr. Schapiro, Mr. Winn, and Mr. Lightsey regarding withdrawal of counsel representing defendants.
6/17/2019	Sarah Davis	2.00	\$220.00	\$ 440.00	Review and analyze document production and draft spreadsheet of financial transactions in preparation of hearing on Jurisdiction
6/18/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Conferences with co-counsel re withdrawal of counsel for defendants and related matters; preparation for hearing
6/18/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and comment on defense motion to withdraw
6/18/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review motion to withdraw and related correspondence from Quinn Emanuel team.
6/20/2019	Marshall Winn	1.70	\$650.00	\$ 1,105.00	Follow up on defendants' motion to withdraw; strategy development
6/21/2019	Marshall Winn	1.40	\$650.00	\$ 910.00	Conferences with Mr. Lightsey and Ms. Anna re response to motion to withdraw; outline response; related email communications with Mr. Schapiro
6/21/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review Mr. Winn's proposed outline for response to motion to withdraw and confer with Mr. Winn and Mr. Schapiro regarding same.
6/24/2019	Marshall Winn	2.80	\$650.00	\$ 1,820.00	Miscellaneous matters; conference with Ms. Anna re response to defendants' counsel's motion to withdraw; telephone conference with chambers of magistrate judge re scheduled hearing on discovery matters; related conferences with Mr. Lightsey and email communications with Mr. Schapiro
6/24/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Discussion and emails with co-counsel re hearing on motion to withdraw, hearing on motion to compel
6/24/2019	Rachael L. Anna	2.80	\$450.00	\$ 1,260.00	Review notice of hearing and related analysis from Quinn Emanuel team; meeting with Mr. Winn to discuss preparation of response to motion to withdraw; review protective order status, documents produced and discovery responses for purposes of preparing response to motion to withdraw.
6/24/2019	Sarah Davis	0.50	\$220.00	\$ 110.00	Review and docket Hearing on Defendants' Motion to Withdraw Appearance and Representation
6/24/2019	Sarah Davis	0.30	\$220.00	\$ 66.00	Brief review and analysis of total document productions made; Emails with attorneys regarding same
6/25/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Receive and review notice from court canceling hearing on motion to compel pending resolution of motion to withdraw; review and revise draft memorandum in response to motion to withdraw; related conferences with Ms. Anna and Mr. Lightsey
6/25/2019	Wallace Lightsey	0.80	\$650.00	\$ 520.00	Emails and conferences re pending motions and strategy; review and comment on draft response to motion to withdraw
6/25/2019	Rachael L. Anna	7.10	\$450.00	\$ 3,195.00	Review confidentiality issues associated with documents and prior agreements with current counsel for purposes of preparing response to motion to withdraw; prepare response to motion to withdraw; confer with Ms. Davis regarding information needed for response.
6/25/2019	Sarah Davis	0.50	\$220.00	\$ 110.00	Brief review and analysis of financial transactions in support of claims regarding jurisdictional discovery; Emails with attorneys regarding same
6/26/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Revisions to response to motion to withdraw; related email communications with and telephone conferences with co-counsel
6/26/2019	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Review and edit response to motion to withdraw and email exchange re same
6/26/2019	Rachael L. Anna	1.50	\$450.00	\$ 675.00	Confer with Mr. Winn and Mr. Lightsey regarding edits to response to motion to withdraw; organize exhibits; review edits by Quinn Emanuel team to response to motion to withdraw; review revised response.
6/27/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Final review and arrangements for filing of response to motion to withdraw; related follow up
6/27/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review of final draft of response to motion to withdraw and emails re same
6/27/2019	Rachael L. Anna	1.90	\$450.00	\$ 855.00	Review revised response to motion to withdraw and prepare exhibits; confer with Mr. Winn regarding confidentiality and make appropriate revisions to brief; confer with Ms. Davis regarding filing and prepare response to be filed.
6/27/2019	Sarah Davis	2.00	\$220.00	\$ 440.00	Edit and revise Plaintiff's Response to Motion to Withdraw Appearance and Representation and exhibits; Electronically file same
6/28/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Re administrative matters: telephone conference with Mr. Sweet (counsel for Krupa et al.); related work
6/28/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Telephone conference with Marshall Winn re motion to withdraw appearance by Andrew Bentz; review and comment on draft motion; review local rule re same
6/28/2019	Sarah Davis	1.50	\$220.00	\$ 330.00	Draft and revise Motion to Withdraw as Counsel for Andrew Bentz
7/10/2019	Marshall Winn	0.60	\$650.00	\$ 390.00	Conferences with Ms. Anna re issues of withdrawal of opposing counsel; email communications with Mr. Schapiro



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Date	Timekeeper	Hours	Rate	Amount	Narrative
7/10/2019	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Review information prepared by Ms. Davis related to jurisdictional discovery and defendants' motion to compel; review correspondence from opposing counsel and Quinn Emanuel related to court hearing.
7/11/2019	Marshall Winn	1.60	\$650.00	\$ 1,040.00	Follow up re procedural matters, with conferences with Mr. Lightsey and Ms. Anna; email communications with Mr. Schapiro; email communications with opposing counsel; telephone conference with Mr. Bakala
7/11/2019	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review materials on motion to withdraw; emails with Marshall Winn and Rachael Anna re same
7/11/2019	Rachael L. Anna	2.40	\$450.00	\$ 1,080.00	Confer with Mr. Winn and Mr. Lightsey regarding filing motion to withdraw appearance; review legal authority related to conditions for withdrawing counsel and applicable rules and circulate relevant authority.
7/12/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Emails with court and counsel re motion hearing
7/15/2019	Marshall Winn	0.50	\$650.00	\$ 325.00	Email communications with judicial clerk; email communications with opposing counsel re rescheduling of hearing; related follow up
7/15/2019	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Ms. Davis regarding rescheduled court hearing; review correspondence from court related to court hearing.
7/23/2019	Marshall Winn	2.00	\$650.00	\$ 1,300.00	Conferences with client re status, strategy, theory
7/29/2019	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Telephone conference with Mr. Daniel; conference with Mr. Lightsey re strategy; related email communications with Mr. Schapiro and Quinn Emanuel counsel
7/29/2019	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with M.Winn and Quinn Emanuel team regarding strategy for upcoming hearing.
7/29/2019	Law Clerk	4.00	\$200.00	\$ 800.00	Researched personal jurisdiction -- MBradley
7/30/2019	Law Clerk	4.00	\$200.00	\$ 800.00	Researched domicile -- MBradley
7/31/2019	Law Clerk	5.20	\$200.00	\$ 1,040.00	Read defendant's motion to dismiss; legal research on domicile issues; created a chart of cases -- MBradley
8/1/2019	Law Clerk	4.00	\$200.00	\$ 800.00	Draft informal memo summarizing domicile research; finalized case chart -- MBradley
8/7/2019	Marshall Winn	5.20	\$650.00	\$ 3,380.00	Preparation for and travel for hearing; related conferences with Mr. Schapiro
8/8/2019	Marshall Winn	9.30	\$650.00	\$ 6,045.00	Appearance at hearing (with Mr. Schapiro) and receipt of oral order and discussion favorable to our position; response to draft order favoring our position; conferences with Mr. Schapiro re strategy going forward; related follow up re civil and criminal matters; related conferences with Mr. Lightsey and Ms. Anna
8/8/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Telephone conference with Marshall Winn; review and comment on proposed order
8/8/2019	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Telephone conference with Mr. Winn regarding court hearing and strategy for litigation; review proposed order and confer with W.Lightsey and Quinn Emanuel team regarding proposed order.
8/9/2019	Marshall Winn	1.10	\$650.00	\$ 715.00	Follow up on miscellaneous matters following withdrawal of defendants' counsel; review and revise plaintiffs' draft order; related conferences with Mr. Schapiro
8/9/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with Quinn Emanuel team regarding proposed order and case strategy; circulate information requested by A.Schapiro for proposed order.
8/12/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review hearing transcript related to return of documents.
8/12/2019	Sarah Davis	0.50	\$220.00	\$ 110.00	Communications with attorneys regarding case deadlines following recent hearing on Motion to Withdraw
8/13/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Receive and review court order granting withdrawal motion of defense counsel; related follow up; planning for further
8/13/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Emails with co-counsel re case strategy in light of order on motion to withdraw
8/14/2019	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Conference call with co-counsel re strategy during time for defendants to obtain new counsel; follow up conference with Marshall Winn and Rachael Anna re same
8/14/2019	Rachael L. Anna	4.90	\$450.00	\$ 2,205.00	Confer with M.Winn regarding review to determine all documents returned by opposing law firms; confer with opposing counsel regarding status of return production; review document productions and other related information produced by law firms.; telephone conference with Quinn Emanuel team to discuss case strategy.
8/15/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with withdrawing counsel regarding document production return and review information provided by withdrawing law firm.
8/20/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Conference with Mr. Bakala re status and strategy
8/22/2019	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Telephone conference with Czech counsel and Switzerland counsel re developments; email communications with Mr. Schapiro re strategic considerations
8/23/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review memo on amending complaint, and respond to Andy Schapiro re same
8/26/2019	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Review memorandum related to case strategy and correspondence with W.Lightsey, M.Winn, Quinn Emanuel team regarding same.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
8/27/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with S.Davis regarding motion to withdraw on behalf of A.Bentz; review correspondence from D.Lakin related to default judgment and procedural rules.
8/28/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Emails re counsel for Swart and Crowds on Demand, preparation for motion for default
8/28/2019	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Review information related to new counsel and voice mail from new opposing counsel; review correspondence from Quinn Emanuel regarding strategy.
8/29/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Emails re strategy with respect to Swart and Crowds on Demand
8/29/2019	McKinley H. Hyman	0.50	\$250.00	\$ 125.00	Legal research regarding settlement agreements; meet with Rachel Anna regarding the same
8/29/2019	Rachael L. Anna	2.40	\$450.00	\$ 1,080.00	Review legal authority related to settlement issues; meeting with Ms. Hyman to discuss research needed for agreements; review legal authority with Mr. Lightsey.
9/3/2019	McKinley H. Hyman	6.90	\$250.00	\$ 1,725.00	Legal research regarding settlement agreements
9/4/2019	Marshall Winn	1.50	\$650.00	\$ 975.00	Case administration matters; email communications with co-counsel re overture by new counsel for Swart and CoD; conferences with Mr. Lightsey re ideas for response; review legal research on covenant not to execute
9/4/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Telephone conference with Mr. Winn regarding litigation.
9/5/2019	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Review of Wyche research re potential responses to offers of settlement from Crowds on Demand and Swart; conferences with Mr. Schapiro and other Quinn Emanuel counsel (with Mr. Lightsey and Ms. Anna) re strategic planning upon appearance of new counsel for Crowds on Demand and Swart and advice re anticipated communications with new
9/5/2019	Wallace Lightsey	1.40	\$650.00	\$ 910.00	Emails re strategy; conference call with co-counsel; review legal research on settlement agreements; review prior legal research on partial settlements
9/5/2019	McKinley H. Hyman	3.00	\$250.00	\$ 750.00	Legal research regarding settlement agreements; email correspondence regarding the same
9/5/2019	Rachael L. Anna	0.80	\$450.00	\$ 360.00	Review research by Ms. Hyman related to settlement agreements with opposing parties and review cases cited by Ms. Hyman; review update from Quinn Emanuel regarding meet and confer discussions with opposing counsel.
9/5/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review meet and confer correspondence with opposing counsel related to appearance.
9/9/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Telephone conference with Amanda Bradley re local representation and consent to motion for extension; review motion; review filings
9/9/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review notice of appearance issue and consent order.
9/10/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Emails with co-counsel re notice of appearance and follow up communications with new counsel for Swart / COD
9/10/2019	Sarah Davis	0.20	\$220.00	\$ 44.00	Multiple communications with case team regarding court filings and notifications
9/11/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review summary of meet and confer discussions with opposing counsel.
9/13/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review strategy for meet and confer discussions with opposing counsel.
9/17/2019	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Conferences with client re defendant settlement overtures
9/18/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review strategy related to opposing counsel.
9/19/2019	Marshall Winn	2.80	\$650.00	\$ 1,820.00	Analysis and development of tactical options re overtures for settlement by co-defendants Swart and Crowds on Demand; email communications with Mr. Schapiro; conference telephone call with Mr. Schapiro and Quinn Emanuel attorneys and Mr. Lightsey and Ms. Anna and development of plan going forward
9/19/2019	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Conference with Marshall Winn; email co-counsel re conference call; telephone conference with co-counsel re strategy with Swart and Crowds on Demand
9/19/2019	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Telephone conference with Quinn Emanuel lawyers to discuss case strategy; review new opinion related to libel law.
9/20/2019	Rachael L. Anna	0.90	\$450.00	\$ 405.00	Review strategy, legal authority, and implications for agreement with opposing party.
9/23/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Email exchange with Rachael Anna and Marshall Winn re strategy and next steps; review legal research re covenants not to execute
9/23/2019	Rachael L. Anna	3.20	\$450.00	\$ 1,440.00	Review research and cases identified by Ms. Hyman; review additional cases related to agreements with opposing parties; prepare summary for review by Mr. Winn and Mr. Lightsey.
9/24/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Receive and review court notice of status hearing; conferences with Mr. Lightsey re strategic and tactical implications; email communications with and telephone conferences with Mr. Schapiro; telephone conference with Mr. Paul
9/24/2019	Wallace Lightsey	1.50	\$650.00	\$ 975.00	Review notice of status conference and emails with co-counsel re same; conference with Marshall Winn re next steps; telephone conference with Mr. Schapiro; review order on time to answer and email Marshall Winn re same
9/24/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review notice of status conference hearing; notices of appearances filed by opposing counsel; and correspondence with Quinn Emanuel team.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
9/25/2019	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Conferences with Mr. Lightsey; telephone and email messages to Messrs Obermeier and Sweet (former counsel to Krupa) re notification of status conference; conference with paralegal re preparation of notice to Krupa
9/25/2019	Sarah Davis	0.70	\$220.00	\$ 154.00	Receipt and review of daily court filings and update Pleadings Index with the same
9/25/2019	Sarah Davis	0.10	\$220.00	\$ 22.00	Correspondence with Mr. Winn regarding notifying Plaintiff Krupa of Status Conference Hearing
9/26/2019	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Communications with former counsel to Krupa; service of notice upon Krupa; related matters and communications
9/26/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review response from former opposing counsel related to hearing and certificate of service.
9/26/2019	Sarah Davis	2.30	\$220.00	\$ 506.00	Draft and prepare for filing a Certificate of Service of Notice of Hearing and coordinate delivery of the same abroad to Defendant Pavol Krupa via Federal Express
9/27/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Telephone conferences with Mr. Schapiro re negotiation objectives and strategies and responses to counsel for Swart and Crowds on Demand
9/29/2019	Marshall Winn	1.70	\$650.00	\$ 1,105.00	Review email; conference with Mr. Bakala; email communications with Mr. Paul re follow up; email communications with Mr. Lightsey re strategy
9/30/2019	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Conferences with Mr. Lightsey and Ms. Anna re items for status conference; telephone conference with Mr. Paul; telephone conference with Mr. Schapiro
9/30/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review email from Marshall Winn re Krupa; conference with Mr. Winn re same
9/30/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review receipt of notice of court hearing.
9/30/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review confirmation of receipt by S.Davis regarding notice of hearing; review update from potential witness related to opposing party; meeting with M.Winn regarding strategy for court hearing.
10/1/2019	Marshall Winn	5.20	\$650.00	\$ 3,380.00	Preparation for status conference, including telephone conferences with Mr. Daniel, further development of strategy, conferences with Mr. Lightsey and Mr. Schapiro; receive and review court notice of rescheduling; further conferences with fellow counsel re modifications to strategy; attention to service of notice of rescheduled hearing upon Krupa via email and FedEx delivery
10/1/2019	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Review notice from court re rescheduling of status conference; conference with Marshall Winn re same; emails with Sarah Davis re same; draft email to co-counsel outlining thoughts on next steps
10/1/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review docket entry related to hearing; confer with Mr. Winn, Ms. Davis, and Mr. Lightsey regarding rescheduled hearing and related notice.
10/1/2019	Sarah Davis	1.90	\$220.00	\$ 418.00	Prepare Notice of Rescheduled Hearing and Certificate of Service for the same to Mr. Krupa via Federal Express; Transmit the same through email communications and work to file the same with the Court; Communications with Mr. Winn regarding the same
10/7/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review update from Ms. Davis regarding attempt to serve Krupa with notice of hearing.
10/7/2019	Sarah Davis	0.30	\$220.00	\$ 66.00	Research status of Notice of Rescheduled Hearing to Krupa via Federal Express and email communications with Mr. Winn regarding the same
10/8/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Email exchange re settlement terms with Swart/Crowds
10/8/2019	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review strategy related to settlement terms for Crowds on Demand and Swart with Quinn Emanuel, Mr. Lightsey, and Mr. Winn.
10/9/2019	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Email communications and related analysis with Messrs Schapiro et al. re strategies in response to settlement overtures by Swart and Crowds
10/9/2019	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Email exchange with co-counsel re settlement with Swart/Crowds
10/9/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review strategy related to settlement terms for Crowds on Demand and Swart with Quinn Emanuel, Mr. Lightsey, and Mr. Winn.
10/16/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and respond to emails re settlement with Swart/Crowds
10/16/2019	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Review and compare settlement terms proposed by Crowds on Demand and Swart; confer with Mr. Winn and Mr. Lightsey regarding comparison; review comments by Quinn Emanuel regarding settlement proposal and preparation of settlement agreement and covenant not to execute.
10/17/2019	Rachael L. Anna	1.90	\$450.00	\$ 855.00	Research covenants not to execute provisions; review correspondence from Quinn Emanuel regarding settlement issues.
10/18/2019	Wallace Lightsey	5.00	\$650.00	\$ 3,250.00	Draft settlement agreement and covenant not to execute; conference with Marshall Winn re same and review and discuss Marshall Winn edits and comments on same; emails with co-counsel

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Date	Timekeeper	Hours	Rate	Amount	Narrative
10/18/2019	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Review draft settlement agreement and covenant not to execute; confer with Mr. Lightsey and Mr. Winn regarding covenant not to execute.
10/21/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Conference with Marshall Winn re status conference and settlement strategy
10/21/2019	Sarah Davis	0.20	\$220.00	\$ 44.00	Conference with Mr. Winn regarding materials needed in preparation of upcoming Hearing and Status Conference
10/22/2019	Marshall Winn	1.50	\$650.00	\$ 975.00	Telephone conference with and email communications with Mr. Schapiro re potential settlement with Swart and Crowds On Demand; outlines for hearing
10/22/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review draft public statement from Marshall Winn and respond to email re same
10/22/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Preparation of information for court hearing.
10/22/2019	Sarah Davis	4.90	\$220.00	\$ 1,078.00	Create case timeline in preparation of Hearing and Status Conference
10/23/2019	Marshall Winn	6.50	\$650.00	\$ 4,225.00	Preparation for hearing; conference with Mr. Schapiro
10/23/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Assist S.Davis with preparing information for court status conference hearing.
10/23/2019	Sarah Davis	1.20	\$220.00	\$ 264.00	Update and revise case timeline and prepare additional materials in preparation of Hearing and Status Conference
10/24/2019	Marshall Winn	7.90	\$650.00	\$ 5,135.00	Preparation for and appearance at hearing before Judge Norton; preparation of draft order; receipt of signed court order that pending motion to compel be withdrawn and that Krupa must serve response within 21 days; related conferences with Messrs Daniel, Schapiro; email communications with client
10/24/2019	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Email exchange with co-counsel re status conference; telephone conference with Marshall Winn; review court order
10/24/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review order and court docket text; review internal correspondence related to notice to defendant Krupa.
10/24/2019	Sarah Davis	0.80	\$220.00	\$ 176.00	Receipt and review of multiple case filings and communications with attorneys regarding the same; Docket case deadlines pursuant to October 24th Order issued by Judge Norton
10/25/2019	Marshall Winn	1.10	\$650.00	\$ 715.00	Attention to service of court order and minutes upon Krupa; telephone conference with Mr. Bakala
10/25/2019	Sarah Davis	1.50	\$220.00	\$ 330.00	Draft Certificate of Service and coordinate service of Notice of October 24th Order of Judge Norton to Pavol Krupa by Federal Express and Email; File the same with the Court
10/27/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Receive and review Swart/Crowds proposed changes to draft settlement agreement; prepare comments to same; email communications with Mr. Schapiro et al.
10/28/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and comment on opposing counsel's revisions to settlement agreement
10/28/2019	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review counter proposal from opposing party; review correspondence from Mr. Winn and Mr. Lightsey regarding strategy for countering terms.
11/5/2019	Marshall Winn	0.60	\$650.00	\$ 390.00	Email communications with Mr. Schapiro re proposed revisions to settlement language from defendants; related conferences with Mr. Lightsey
11/5/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Conference with Marshall Winn re status of settlement; emails re Wiley Rein securesend link expiration
11/5/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review correspondence related to strategy for negotiating settlement terms.
11/6/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and respond to email re settlement terms; review prior emails on settlement terms
11/7/2019	Marshall Winn	0.80	\$650.00	\$ 520.00	Follow up email communications with Mr. Schapiro re proposed settlement agreement
11/7/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review correspondence related to strategy for negotiating settlement terms.
11/11/2019	Marshall Winn	4.40	\$650.00	\$ 2,860.00	Receive and review emailed answer of Pavol Krupa and attachments; preliminary analysis of same; conference with Ms. Anna re drafting of motion to strike; related email communications with Mr. Schapiro; telephone conference with Mr. Schapiro re status of settlement discussions with Swart and Crowds on Demand; related additional commentary on our position
11/11/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Email exchange with Marshall Winn and Andy Schapiro re settlement terms with Swart
11/11/2019	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Review Answer filed by Krupa; confer with Mr. Winn and Ms. Davis regarding Answer and strategy for responding to Answer; confer with counsel regarding status of negotiation with Crowds on Demand and terms of settlement agreement.
11/11/2019	Sarah Davis	0.50	\$220.00	\$ 110.00	Receipt and review of Answer of Pavol Krupa to Amended Complaint as emailed to the court attaching documents for
11/13/2019	Marshall Winn	0.80	\$650.00	\$ 520.00	Conferences with Ms. Anna and Mr. Lightsey re response to Krupa answer to complaint
11/13/2019	Rachael L. Anna	0.90	\$450.00	\$ 405.00	Meeting with Mr. Winn to discuss exhibits filed to Answer; meeting with Ms. Davis to review the exhibits filed to Answer; review correspondence from Mr. Paul regarding strategy for responding to Answer; confer with Mr. Winn and Mr. Lightsey regarding strategy for responding to Answer.
11/14/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review Krupa answer; emails with Marshall Winn and Rachael Anna re motion strategy on same
11/15/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review rules on motion to strike; emails with Rachael Anna re same; review court docket for entry of Krupa answer

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Date	Timekeeper	Hours	Rate	Amount	Narrative
11/15/2019	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Mr. Winn and Mr. Lightsey regarding strategy for responding to deficient Answer.
11/19/2019	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Email communications with Mr. Schapiro re status of settlement with Swart et al.; receive and review as-filed answer of Krupa; conferences with Mr. Lightsey and Ms. Anna re response to filing resembling answer of Krupa
11/19/2019	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Emails with co-counsel re ECF docketing of Krupa answer, status of settlement with Swart; conference with Marshall Winn and Rachael Anna re motion to strike
11/19/2019	Rachael L. Anna	1.50	\$450.00	\$ 675.00	Meetings with Mr. Winn and Mr. Lightsey to discuss strategy for responding to insufficient Answer; confer with S.Davis regarding preparation of motion to strike; review Answer and exhibits posted to the court docket to confirm receipt of same materials; confer with national counsel regarding pleading posted to docket; confer with counsel regarding status of settlement; review new information received from Mr. Winn that supports claims against Krupa.
11/19/2019	Sarah Davis	1.30	\$220.00	\$ 286.00	Receipt and review of Pavol Krupa's Answer to Amended Complaint, as filed with the court, including review of attachments and communications with attorneys regarding the same; Draft shell Motion to Strike Krupa's Answer
11/20/2019	Marshall Winn	0.90	\$650.00	\$ 585.00	Follow up email communications with Mr. Schapiro re settlement negotiations with Swart and Crowds on Demand
11/20/2019	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review status of settlement agreement with Mr. Winn and national counsel; review correspondence with other counsel related to investigation of Krupa.
11/21/2019	Rachael L. Anna	4.80	\$450.00	\$ 2,160.00	Review Answer and exhibits; review legal authority and various cases related to motion to strike; draft outline for motion to strike.
11/22/2019	Rachael L. Anna	5.90	\$450.00	\$ 2,655.00	Draft motion to strike; review legal authority related to motion to strike; review analytics related to relevant opinions for purposes of drafting motion to strike.
11/22/2019	Sarah Davis	0.40	\$220.00	\$ 88.00	Brief review of Motion to Strike Answer of Pavol Krupa and communications with Ms. Anna regarding the same
11/24/2019	Rachael L. Anna	1.00	\$450.00	\$ 450.00	Review and review motion to strike; review legal authority related to motion; review paragraphs and internet sources cited in Answer; confer with Mr. Winn regarding motion.
11/25/2019	Marshall Winn	1.10	\$650.00	\$ 715.00	Email communications with Mr. Schapiro; receive and review proposed revised settlement terms from counsel for Swart and Crowds on Demand; conferences with Mr. Lightsey and Ms. Anna
11/25/2019	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and comment on motion to strike; review and comment from draft settlement agreement from Swart/COD
11/25/2019	Rachael L. Anna	3.50	\$450.00	\$ 1,575.00	Review comments to motion to strike from Mr. Winn and Mr. Lightsey; revise motion to strike; confer with S.Davis regarding identification of orders to potentially cite in motion to strike; review revised settlement agreement from Crowds on Demand.
11/25/2019	Sarah Davis	2.50	\$220.00	\$ 550.00	Research and review numerous Motions to Strike granted by Judge Norton; Communications with Ms. Anna regarding the same
11/26/2019	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and revise motion to strike and comment on same
11/26/2019	Rachael L. Anna	3.30	\$450.00	\$ 1,485.00	Review orders related to motion to strike from Judge Norton and other legal authority for motion to strike; review comments to motion to strike from Mr. Schapiro, Mr. Winn, and Mr. Lightsey and revise motion to strike to incorporate
11/26/2019	Sarah Davis	0.60	\$220.00	\$ 132.00	Additional correspondence with Ms. Anna regarding Judge Norton's motions to strike granted
11/27/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on revised motion to strike; emails with co-counsel re same
11/27/2019	Rachael L. Anna	2.10	\$450.00	\$ 945.00	Review and revise motion to strike; confer with Mr. Winn and Ms. Davis regarding issues related to service of documents; review and revise motion for alternative service; review unresolved issues related to settlement agreement; confer with Mr. Winn, Mr. Lightsey, and Quinn Emanuel team regarding required status update; confer with Mr. Winn regarding service issue related to pro se party.
11/27/2019	Sarah Davis	3.40	\$220.00	\$ 748.00	Draft Motion to Serve Defendant Krupa Electronically; Review and revise Motion to Strike Krupa's Answer to Amended Complaint and prepare the same for filing with the court; Draft letter to Defendant Krupa and coordinate transmittal of filings to the same via email and US Mail
11/29/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review status update submitted to court.
12/2/2019	Marshall Winn	0.40	\$650.00	\$ 260.00	Receive and review order of Magistrate Judge Baker re Krupa filing requirements; conference with colleagues
12/2/2019	Rachael L. Anna	0.80	\$450.00	\$ 360.00	Review court order related to requirements for Krupa; confer with S.Davis regarding court order and attachment; review information related to investigation of Krupa; review returned materials FedEx materials related to attempted delivery to Krupa.
12/2/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with S.Davis regarding status report submitted to court by deadline; review court order and confer with S.Davis regarding missing attachment.



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Date	Timekeeper	Hours	Rate	Amount	Narrative
12/2/2019	Sarah Davis	1.50	\$220.00	\$ 330.00	Receipt and review of numerous Fed Ex packages returned to sender from Czech Republic and email correspondence with Mr. Winn regarding the same; Review Order of Judge Baker and docket related case deadlines for the same
12/4/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails with Marshall Winn and Rachael Anna re service issue and settlement with Swart
12/4/2019	Rachael L. Anna	0.70	\$450.00	\$ 315.00	Review service of court documents with M.Winn and W.Lightsey; review rules related to service and prepare summary regarding same; confer with S.Wascom regarding issue with court docket.
12/9/2019	Rachael L. Anna	1.00	\$450.00	\$ 450.00	Review court order related to pending motions; confer with Mr. Winn and S.Davis regarding hearing transcript; review case related documents in order to determine response to court; review proposed response from opposing counsel and confer with Mr. Winn, Mr. Lightsey, and Quinn Emanuel regarding same.
12/10/2019	Marshall Winn	0.80	\$650.00	\$ 520.00	Receive and review email from Krupa containing purported document for filing; review transcript of hearing of October 26; conference with colleagues re anticipated response
12/10/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails with co-counsel re settlement and response to court inquiry
12/10/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Telephone conference with Marshall Winn and Rachael Anna re response to court inquiry; telephone conference with co-counsel re same
12/10/2019	Rachael L. Anna	2.30	\$450.00	\$ 1,035.00	Telephone conference with Mr. Winn and Mr. Lightsey to discuss case strategy; review court order and transcript; confer with Quinn Emanuel regarding strategy for response to court; review correspondence with opposing counsel and court; review submission to court from defendant Krupa; confer with S.Davis regarding transcript request.
12/10/2019	Sarah Davis	0.50	\$220.00	\$ 110.00	Correspondence to obtain copy of transcript of October 24 Hearing.
12/11/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with S.Davis regarding court submission.
12/13/2019	Marshall Winn	0.80	\$650.00	\$ 520.00	Receive and review so-called completion of the reply from Krupa with copy to court; conferences with colleagues re anticipated filing and appropriate response
12/13/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review amended answer and confer with W.Lightsey and M.Winn regarding same.
12/15/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with S.Davis regarding filing by Krupa.
12/16/2019	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Review and comment on revisions to settlement agreement from opposing counsel
12/16/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review opposing party's proposed changes to settlement agreement and confer with M.Winn, W.Lightsey, and Quinn Emanuel regarding settlement strategy.
12/17/2019	Marshall Winn	2.80	\$650.00	\$ 1,820.00	Conferences with colleagues and email communications with Mr. Schapiro re settlement negotiations with counsel for Swart and Crowds on Demand
12/17/2019	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with M.Winn, W.Lightsey, and Quinn Emanuel regarding settlement strategy; provide comments to latest version of settlement agreement.
12/18/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Negotiations re settlement with Swart and Crowds on Demand: review response from counsel for Swart defendants; conferences with and email communications with Mr. Schapiro
12/18/2019	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with M.Winn, W.Lightsey, and Quinn Emanuel regarding response from opposing counsel to settlement and review strategy.
12/19/2019	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Telephone conference with Mr. Paul re settlement negotiations; receive and review materials from Krupa (so-called completion of the reply); related email communications with co-counsel; email communications with Mr. Schapiro re settlement negotiations
12/19/2019	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails with co-counsel re Swart settlement terms
12/20/2019	Marshall Winn	2.20	\$650.00	\$ 1,430.00	Receive and review court filing by Krupa; conference with Ms. Anna re preparation of motion to strike etc., email communications with and telephone conferences with Mr. Schapiro re negotiations to settlement with Swart and Crowds on Demand
12/20/2019	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Review Rule 26 interrogatories and Answer Giles by Krupa; confer with M.Winn, W.Lightsey, and Quinn Emanuel regarding settlement agreement, motion to strike, and interrogatory responses.
12/21/2019	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Email communications with Mr. Schapiro; prepare comments and redrafts of settlement documents with respect to Swart and Crowds on Demand; related email communications
12/23/2019	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Email communications with Mr. Schapiro and related conferences with Mr. Lightsey and Ms. Anna; email communications with counsel for Swart and Crowds on Demand; review Swart's revised proposed settlement agreement incorporating essentially all our demands; prepare joint status report; email communications with counsel for Swart and Crowds on Demand re agreement on same; arrange for filing and service



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Date	Timekeeper	Hours	Rate	Amount	Narrative
12/23/2019	Wallace Lightsey	1.40	\$650.00	\$ 910.00	Draft status report to court; emails re same and re settlement agreement
12/23/2019	Rachael L. Anna	1.00	\$450.00	\$ 450.00	Confer with Ms. Davis regarding motion to strike and answer; review amended answer filed on docket; review draft status report for court; review status of settlement agreement and changes with Mr. Winn, Mr. Lightsey, and Quinn Emanuel.
12/23/2019	Sarah Davis	0.50	\$220.00	\$ 110.00	Review Defendant Krupa's Amended Answer and docket related deadlines for case team
12/27/2019	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review order from court.
12/30/2019	Rachael L. Anna	3.50	\$450.00	\$ 1,575.00	Draft motion to strike; review legal authority related to pleadings and striking pleadings for preparation of motion; review docket entry related to mail service of order.
12/31/2019	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Preparation of motion to strike Amended Answer; related follow up
12/31/2019	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Revise motion to strike; confer with Mr. Lightsey and Mr. Winn regarding motion to strike and amended answer.
1/2/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on draft motion to strike; emails with co-counsel re same
1/2/2020	Rachael L. Anna	3.10	\$450.00	\$ 1,395.00	Review comments from Mr. Winn and Mr. Schapiro to motion to strike and revise motion; review legal authority related to striking pleadings; coordinate with Ms. Davis to prepare motion for filing.
1/3/2020	Marshall Winn	3.90	\$650.00	\$ 2,535.00	Final preparation and filing and service of motion to compel; email communication with Mr. Bakala re same; final comments re draft settlement agreement and exhibit re defendants' testimony; email communications with Mr. Paul re
1/3/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Review motion to strike; coordinate with Ms. Davis to prepare motion for filing; review content of proposed press release
1/3/2020	Sarah Davis	3.50	\$230.00	\$ 805.00	Review Plaintiff's Motion to Strike Defendant Krupa's Amended Answer to Amended Complaint; Draft Certificate of Service for the same and prepare both for filing with the Court; Coordinate delivery of filed copies to Pro Se party via US Mail; Email communications with Ms. Anna and Mr. Winn regarding the same.
1/5/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Emails with co-counsel re settlement with Swart
1/6/2020	Marshall Winn	7.30	\$650.00	\$ 4,745.00	Negotiation and final drafting of settlement agreement with Swart and Crowds on Demand; related telephone conference with Mr. Paul and email communication with Mr. Bakala; related follow up with counsel for Swart Defendants; draft court filing re settlement and related communication with court
1/6/2020	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review emails re joint status report; review email to Judge Norton re same; email Mr. Winn re same; draft follow up to Judge Norton
1/6/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review draft and final joint status report.
1/7/2020	Marshall Winn	0.90	\$650.00	\$ 585.00	Telephone conferences with Mr. Schapiro re follow up to settlement agreement; email communications with Mr. Paul re Swart apology
1/7/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review update from Mr. Lakin regarding key dates related to settlement agreement; confer with Mr. Winn regarding review of documents produced by opposing side.
1/7/2020	Sarah Davis	0.50	\$230.00	\$ 115.00	Prepare Joint Status Report for filing with the Court; Email communications with Mr. Winn regarding the same.
1/8/2020	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Settlement matters; correspondence with counsel for Swart and Crowds On Demand re withdrawal of motion to dismiss; receive and review their related filings; follow up with co-counsel re upcoming dates for performance of settlement tasks by Swart/Crowds; email communications with Mr. Paul and Mr. McShane re publication of Swart and Crowds' apology
1/8/2020	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review emails on settlement and respond to Mr. Winn re potential name of apology URL; review and comment on motion to withdraw motion to dismiss
1/8/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review request to withdraw and confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding same; review withdrawal motion filed on docket.
1/8/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Receipt and review of case filings and email communications with case team transmitting the same
1/9/2020	Marshall Winn	3.30	\$650.00	\$ 2,145.00	Follow up to Swart settlement agreement; related email communications with Mr. Schapiro; receive and review text order of Magistrate Judge Baker; follow up re same with co-counsel; telephone conference with judicial clerk to Magistrate Judge Baker; draft letter to Magistrate Judge Baker re status and suggested action; email communications with counsel for defendants Swart and Crowds re provision of unredacted document pursuant to settlement agreement
1/9/2020	Wallace Lightsey	1.20	\$650.00	\$ 780.00	Review text order from court; email exchange with co-counsel; conference with Mr. Winn; call to Judge Baker's law clerk; follow up on same
1/9/2020	Rachael L. Anna	0.70	\$450.00	\$ 315.00	Confer with Mr. Winn regarding clarification with court required; meeting with Mr. Winn to review telephone conference with clerk; review Mr. Winn's status update to the court; confer with Mr. Winn regarding ediscovery issue and document production formatting.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
1/10/2020	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Attention to Swart/Crowds settlement matters; follow up re documentation production arrangements; receive and review new orders from court granting withdrawal of motion to dismiss and setting time for Swart/Crowds to respond to Amended Complaint
1/10/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Email exchange re invoice for document production; review invoice for same
1/10/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Review ediscovery issue and document production formatting with Mr. Winn, Mr. Schapiro, ediscovery vendor, and opposing counsel.
1/10/2020	Sarah Davis	0.70	\$230.00	\$ 161.00	Email communications with Mr. Krupa transmitting Plaintiff's prior email communications with the Court including Joint Status Report
1/13/2020	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Attention to Swart/Crowds settlement matters; conferences with Ms. Anna re document production by Swart/Crowds; telephone conference with Ms. Samkova and Messrs Paul and McShane; email communications with Mr. Schapiro
1/13/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Check settlement agreement for terms re use of public statement
1/13/2020	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Confer with ediscovery vendor regarding project estimate; confer with Mr. Winn and Ms. Minor regarding ediscovery vendor issues.
1/14/2020	Marshall Winn	4.10	\$650.00	\$ 2,665.00	Attention to Swart/Crowds apology and publication of same; related email communications with co-counsel and drafting of revision; related follow up; conferences with Ms. Anna re production issues concerning Swart/Crowds documents; telephone conference with counsel for Swart/Crowds in resolution of same; related follow up
1/14/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and comment on draft public statement
1/14/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Telephone conferences and correspondence with Mr. Winn and Mr. Schapiro regarding document formatting issues; telephone conference and correspondence with opposing counsel regarding ediscovery issue; confer with ediscovery vendor regarding project; review correspondence from opposing counsel related to notification of court instructions.
1/15/2020	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Confer with L. Roberson regarding ESI instructions; review ESI instructions.
1/16/2020	Marshall Winn	0.60	\$650.00	\$ 390.00	Conferences with Ms. Anna re discovery from Swart and Crowds On Demand; email communications with Mr. Paul re press inquiry
1/16/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Draft instructions for document formatting and confer with L. Roberson regarding same; review Everlaw specs for load files for ediscovery instructions; confer with opposing counsel regarding document instructions.
1/16/2020	Larry Roberson	0.60	\$235.00	\$ 141.00	Analyze ESI instructions for native productions; Communicate feedback to Ms. Anna re: the same
1/17/2020	Marshall Winn	0.50	\$650.00	\$ 325.00	Follow up conferences with re document production; email communication with Mr. Schapiro re unredacted proffer
1/17/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and respond to emails re document production from Swart, apology by Swart, reaction by Krupa
1/17/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review Czech news article related to public comments from Krupa.
1/18/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Correspond with Ms. Davis regarding key deadlines related to settlement agreement with Crowds on Demand.
1/21/2020	Marshall Winn	1.60	\$650.00	\$ 1,040.00	Email communications with Mr. Schapiro to follow up on documents expected from Swart/Crowds; conferences with co-counsel re various matters; attention to strategy and planning
1/21/2020	Rachael L. Anna	0.70	\$450.00	\$ 315.00	Confer with Ms. Davis regarding opposing party's obligations under settlement agreement; confer with Mr. Winn regarding requirements under settlement agreement and documents to be produced; review updates from Mr. Winn regarding status of media issues with Krupa; review update from opposing counsel regarding status of providing information pursuant to settlement agreement.
1/21/2020	Sarah Davis	1.00	\$230.00	\$ 230.00	Review Settlement Agreement with Swart Parties; Docket numerous deadlines for case team pursuant to the Settlement Agreement
1/22/2020	Marshall Winn	7.50	\$650.00	\$ 4,875.00	Email communications with Mr. Schapiro following up on status of document to be produced by Swart/Crowds; conferences with co-counsel and Czech counsel; conferences with client; conferences with Mr. Paul; related follow up on
1/22/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Email exchange with co-counsel re follow up on settlement with Swart, unredacted proffer
1/22/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review materials from Mr. Winn regarding to status related to press; review information provided by opposing counsel pursuant to settlement agreement.
1/23/2020	Marshall Winn	2.00	\$650.00	\$ 1,300.00	Email communications with co-counsel; email communications with Mr. Schapiro; conferences with Mr. Paul re witnesses
1/28/2020	Marshall Winn	2.20	\$650.00	\$ 1,430.00	Follow up to Swart settlement matters; attention to transfer of domain name; telephone conference with Mr. Paul re Czech matters
1/29/2020	Marshall Winn	0.90	\$650.00	\$ 585.00	Follow up re Swart/Crowds settlement matters

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Date	Timekeeper	Hours	Rate	Amount	Narrative
1/30/2020	Marshall Winn	1.60	\$650.00	\$ 1,040.00	Receive and review Krupa's so-called response of the defendant; conferences with Mr. Lightsey and Ms. Anna; email communications with Mr. Schapiro et al. re analysis and response
1/30/2020	Wallace Lightsey	0.90	\$650.00	\$ 585.00	Emails re status report at this time; review prior emails and court docket entries re same; review Krupa response to motion to strike; emails with co-counsel re same; conference with Mr. Winn re same
1/30/2020	Rachael L. Anna	1.60	\$450.00	\$ 720.00	Confer with Ms. Davis, Mr. Lightsey, and Quinn Emanuel regarding status report and docket entry; review opposition to motion to strike; meeting with Mr. Winn to discuss strategy for Reply brief; research issues related to magistrate authority for motion to strike; confer with Mr. Lightsey, Mr. Winn, and Quinn Emanuel regarding magistrate review authority.
1/30/2020	Sarah Davis	0.30	\$230.00	\$ 69.00	Receipt and review of case filings and email communications with Ms. Anna regarding the same.
1/31/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Follow up to documents putatively served by Krupa; related email communications with associated counsel; outline reply with Ms. Anna
2/1/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review plan for preparing Reply with Ms. Davis.
2/3/2020	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Receive and review court filing by Krupa; review previously planned response; related email communications with defense team; conference with Ms. Anna re website transfer
2/3/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Confer with Mr. Townsend regarding website transition and other online account transition issues related to Crowds on Demand settlement agreement; confer with opposing counsel regarding website transfer and online account transition; meeting with Mr. Winn to discuss website transfer and online account transition issues.
2/4/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Conferences with Ms. Anna re reply to Krupa's purported response to our motion to strike purported answer; conferences with IT personnel re conveyance of website and social media in connection with settlement of Swart and Crowds On Demand
2/4/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on draft reply in support of motion to strike
2/4/2020	Rachael L. Anna	6.90	\$450.00	\$ 3,105.00	Telephone conference and correspondence with opposing counsel regarding website transfer and online account transition; meeting with Mr. Townsend to review website and online account transition from Crowds on Demand; draft reply to opposition to motion to strike; confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding reply brief; review information prepared by Ms. Davis for preparing reply brief; confer with Mr. Klokocnik regarding website transition; confer with Mr. Winn regarding website transition.
2/4/2020	Sarah Davis	1.80	\$230.00	\$ 414.00	Review all orders, hearing transcripts and text orders demanding Mr. Krupa's presence; Confer with Ms. Anna regarding findings.
2/4/2020	Sarah Davis	0.90	\$230.00	\$ 207.00	Draft Reply to Krupa's Response to Motions to Strike Amended Answers to Amended Complaint; Confer with Ms. Anna regarding the same.
2/5/2020	Marshall Winn	3.20	\$650.00	\$ 2,080.00	Follow up re transfer of website and social media from Swart and Crowds On Demand; revisions to draft reply to Krupa's opposition to motion to strike; email communications with counsel for Swart and Crowds re production of documents; review and advise with comments as to Swart/Crowds apology; related conferences with Mr. Lightsey and Ms. Anna; related email communications with Mr. Schapiro
2/5/2020	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Conference with Mr. Winn; review draft of email note re Swart settlement and comment on same; review settlement agreement; emails re Swart production
2/5/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Telephone conference with opposing counsel and IT consultant to perform transfer of website and online accounts; telephone conference with opposing counsel to review discovery issues; provide update to Mr. Winn regarding website status and discovery.
2/5/2020	Rachael L. Anna	0.90	\$450.00	\$ 405.00	Draft Reply to Opposition to motion to strike.
2/5/2020	Phil Townsend	0.50	\$300.00	\$ 150.00	Change passwords for all social media accounts and hide content from public view and searches
2/5/2020	Phil Townsend	3.00	\$300.00	\$ 900.00	(2/3/20 - 2/5/20): Conference calls with Ms. Anna; calls with Ms. Anna and opposing counsel to transfer stopbakala.org to Wyche and confirm social media accounts and passwords.
2/6/2020	Marshall Winn	3.50	\$650.00	\$ 2,275.00	Final edits and review of reply to Krupa's so-called opposition to our motion to strike; conferences with Ms. Anna re completion of transfer of domain names and social media accounts
2/6/2020	Rachael L. Anna	2.80	\$450.00	\$ 1,260.00	Revise Reply to Opposition to motion to strike; prepare exhibits to motion to strike; prepare reply to and exhibits for filing; confer with Ms. Davis regarding filing motion to strike; confer with Mr. Townsend regarding transfer of website and online accounts; prepare update regarding transfer of website and online accounts for review by Mr. Winn.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
2/6/2020	Sarah Davis	2.00	\$230.00	\$ 460.00	Review and prepare Plaintiff's Reply in Response to Motions to Strike for filing with the Court; Prepare cover letter and transmit the same by US Mail and email to Mr. Krupa; Prepare and transmit bound copy of filing to Chambers, pursuant to Judge's preferences; Email communications with attorneys regarding the same.
2/7/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Mr. Winn regarding website migration status.
2/9/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review request from Mr. Winn related to website migration.
2/10/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review update from Mr. Townsend related to website migration.
2/11/2020	Marshall Winn	0.80	\$650.00	\$ 520.00	Email communications with Ms. Anna re request for production of documents for Swart and Crowds on Demand
2/11/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review article re Krupa and Bakala
2/11/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Draft discovery to serve on Crowds on Demand and Swart; confer with Mr. Winn and Mr. Lightsey regarding discovery requests and document production; confer with Ms. Davis regarding preparation of discovery and service; confer with Mr. Winn and Mr. Townsend regarding status of website migration.
2/12/2020	Marshall Winn	1.70	\$650.00	\$ 1,105.00	Email communications with co-counsel re production of documents by Swart; receive and review article; attention to Czech matters
2/12/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with Ms. Davis regarding preparation of discovery and service; confer with opposing counsel regarding discovery.
2/12/2020	Sarah Davis	1.00	\$230.00	\$ 230.00	Edit and revise Plaintiff's Requests for Production to Adam Swart and Crowds on Demand; Prepare Certificate of Service to Pavol Krupa; Prepare cover letter to Pavol Krupa and send copies of the same via US mail and email.
2/14/2020	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Review and comment on Czech press report
2/14/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review status of document production with Mr. Winn; review articles related to status of litigation.
2/15/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Email communications with Ms. Anna re receipt and analysis of documents from Swart/Crowds on Demand
2/15/2020	Rachael L. Anna	3.50	\$450.00	\$ 1,575.00	Review cover email for transmission of document production; confer with Mr. Roberson regarding opposing party's document production; confer with Mr. Winn regarding strategy for review; search through and perform initial review of documents from opposing counsel and provide update to Mr. Winn and Mr. Lightsey; confer with Quinn Emanuel regarding review of documents.
2/15/2020	Larry Roberson	1.30	\$235.00	\$ 305.50	Analyze Swart defendant production in connection with document review; Communicate with Ms. Anna re: the same
2/16/2020	Marshall Winn	1.30	\$650.00	\$ 845.00	Initial review and analysis of selected documents from Swart/Crowds on Demand; related email communications with co-counsel
2/16/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Emails with Ms. Anna and Mr. Winn re documents pulled from Swart production
2/16/2020	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Search through and perform initial review of documents from opposing counsel and provide update to Mr. Winn and Mr. Lightsey with certain documents related to wire payments.
2/17/2020	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Review documents produced by Swart/Crowds on Demand; related email communications with co-counsel
2/17/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Emails re Swart production; review selected documents
2/17/2020	Rachael L. Anna	4.80	\$450.00	\$ 2,160.00	Review Crowds on Demand metadata report and provide comments to Mr. Winn; confer with Mr. Winn and Mr. Lightsey regarding document analysis; review documents in Crowds production; search for and review specific documents requested by M. Winn and circulate identified documents.
2/17/2020	Larry Roberson	1.30	\$235.00	\$ 305.50	Examine Swart defendant production in connection with document review; Communicate with Ms. Anna re: the same
2/18/2020	Marshall Winn	3.90	\$650.00	\$ 2,535.00	Review documents received from Swart/Crowds on Demand; email communications with and telephone conferences with co-counsel
2/18/2020	Wallace Lightsey	2.50	\$650.00	\$ 1,625.00	Document review with Mr. Winn, Ms. Anna, and Mr. Roberson; review settlement agreement re document production; conference call with co-counsel
2/18/2020	Rachael L. Anna	3.80	\$450.00	\$ 1,710.00	Meeting with Mr. Winn and Mr. Lightsey regarding document analysis; telephone conference with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding Crowds/Swart's document production and strategy; review documents in Crowds/Swart's production; search for and review specific documents requested by Mr. Winn and circulate identified documents; prepare analysis related to payments; confer with Mr. Lakin regarding key communications and analysis regarding Crowds/Swart's document production.
2/18/2020	Larry Roberson	1.40	\$235.00	\$ 329.00	Everlaw training session in connection with review of Swart defendant document production
2/19/2020	Marshall Winn	2.00	\$650.00	\$ 1,300.00	Attention to documents produced by Swart; receive and review filing by Krupa; work on response to same
2/19/2020	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Review sur-reply filed by Krupa; email exchange with co-counsel re motion to strike same
2/19/2020	Lucy Dinkins	0.30	\$340.00	\$ 102.00	Conference with Ms. Anna re strategy for responding to improperly filed sur-reply.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
2/19/2020	Rachael L. Anna	3.30	\$450.00	\$ 1,485.00	Review sur-reply and confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding same; review with Mr. Lakin issues related to Swart and Crowds' document production; confer with Ms. Dinkins regarding options for responding to improper sur-reply; review legal authority for determining appropriate response to sur-reply.
2/19/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Receipt and review of case filings and email communications with attorneys regarding the same.
2/20/2020	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Receive and review filing (so-called Sur-Reply) by Krupa; analysis re response to same; conferences with Ms. Anna re drafting of motion to strike; strategy planning and related email communications with co-counsel
2/20/2020	Wallace Lightsey	0.80	\$650.00	\$ 520.00	Emails re response to Krupa sur-reply, wire payments from Krupa to Crowds on Demand; review and comment on motion to strike/file sur-reply
2/20/2020	Lucy Dinkins	0.40	\$340.00	\$ 136.00	Emails with Ms. Anna re strategy for responding to Defendant's sur-reply and advisability of a motion to strike.
2/20/2020	Rachael L. Anna	5.80	\$450.00	\$ 2,610.00	Draft sur-reply and motion for leave; review legal authority related to motion to strike and confer with Mr. Winn and Mr. Lightsey regarding same; draft motion to strike; review information to cite in motion to strike; confer with Mr. Lakin regarding deficiencies in Swart and Crowds' document production.
2/20/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Phone call to case manager regarding clerk's filing error and review docket
2/21/2020	Marshall Winn	3.70	\$650.00	\$ 2,405.00	Attention to filing and service of motion to strike latest filing by Krupa; receive and review court order granting motion to strike and ordering briefing on jurisdiction; conferences with co-counsel re preparation of memorandum of law to court re jurisdiction issue; related communications with client
2/21/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review motion to strike and correspondence relating to same; review court order; emails with co-counsel re same
2/21/2020	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Review court's order regarding motion to strike; confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding motion to strike; review documents produced by Crowds on Demand and Swart parties to prepare deficiency letter; confer with Ms. Davis regarding information needed for deficiency letter.
2/21/2020	Sarah Davis	2.20	\$230.00	\$ 506.00	Review Swart parties' document production for financial documentation; Email communications with Ms. Anna regarding the same.
2/21/2020	Sarah Davis	1.00	\$230.00	\$ 230.00	Revise Motion to Strike Defendant Pavol Krupa's Sur-Reply; Draft Certificate of Service of the same and prepare for filing with the court; Draft cover letter and submit courtesy copy of filing to Mr. Krupa via US Mail and email.
2/21/2020	Sarah Davis	0.50	\$230.00	\$ 115.00	Review Order Granting Motions to Strike and docket relevant case deadlines for attorneys.
2/24/2020	Marshall Winn	0.80	\$650.00	\$ 520.00	Review and analysis of documents produced by Swart; analysis of deficiencies
2/24/2020	Rachael L. Anna	5.60	\$450.00	\$ 2,520.00	Confer with Ms. Davis regarding information required to prepare deficiency letter; review Crowds on Demand and Swart document production to identify deficiencies; draft deficiency letter.
2/24/2020	Larry Roberson	0.90	\$235.00	\$ 211.50	Analyze Swart Defendant Document Production in connection with document review; Communicate the same with Ms. Davis and Ms. Anna
2/24/2020	Sarah Davis	3.20	\$230.00	\$ 736.00	Review Swart Party's document production for responsiveness and deficiencies; Review and revise Letter to Raul Alcantar regarding production deficiencies; Email Communications with Ms. Anna regarding the same.
2/25/2020	Marshall Winn	1.30	\$650.00	\$ 845.00	Review and analysis of documents produced by Swart; analysis of deficiencies; conferences with Ms. Anna re preparation of deficiency letter; revisions to draft letter
2/25/2020	Wallace Lightsey	1.30	\$650.00	\$ 845.00	Review and revise deficiency letter re Swart/COD production; conference with Ms. Anna re same; emails with Mr. Winn and Ms. Anna re same; review news article
2/25/2020	Rachael L. Anna	2.20	\$450.00	\$ 990.00	Draft deficiency letter; confer with Mr. Lightsey, Mr. Winn, Mr. Lakin, and Mr. Schapiro regarding deficiency letter; telephone conference with Mr. Lakin regarding documents and communications identified and deficiency letter; review key Crowds and Swart documents including ones identified by Mr. Lakin.
2/25/2020	Sarah Davis	1.20	\$230.00	\$ 276.00	Edit and revise case pleadings index for attorney review.
2/26/2020	Marshall Winn	0.80	\$650.00	\$ 520.00	Correspondence with Mr. Schapiro re deficiencies in Swart production and related matters
2/26/2020	Wallace Lightsey	1.80	\$650.00	\$ 1,170.00	Review and comment on documents gleaned from Swart production
2/26/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Confer with Mr. Winn and Mr. Lakin regarding deficiency letter and strategy; review key Crowds and Swart documents including ones identified by Mr. Lakin; prepare information requested by Mr. Winn for strategy; confer with Mr. Lightsey regarding deficiency letter; search for information requested by Mr. Lakin and confer with Mr. Lakin regarding same; confer with Ms. Davis regarding review of Crowds on Demand documents.
2/27/2020	Marshall Winn	0.30	\$650.00	\$ 195.00	Follow up with Mr. Schapiro re deficiency letter and related matters

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Date	Timekeeper	Hours	Rate	Amount	Narrative
2/27/2020	Wallace Lightsey	1.20	\$650.00	\$ 780.00	Review press coverage re Swart apology; review and comment on revisions to draft letter to Swart attorney re production; review final draft of same; conference with Ms. Anna re same
2/27/2020	Rachael L. Anna	1.60	\$450.00	\$ 720.00	Confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding deficiency letter and strategy; revise deficiency letter and circulate with opposing counsel.
2/28/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Correspondence with Mr. Schapiro et al. re deficiency letter; final revision; conferences with Ms. Anna re transmission of letter to counsel for Swart; review initial response of counsel for Swart
2/29/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Review and follow up re court orders striking Krupa's amended answer and partially striking Krupa's answer; follow up re preparation of memorandum supporting jurisdiction over Krupa; follow up on unproduced Amtrust documents
3/2/2020	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Confer with Mr. Winn regarding production of documents in response to Rule 34 request, Swart Parties' document production, and opposition to motion to dismiss for lack of jurisdiction; review documents produced by Swart Parties.
3/3/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Review and revise draft brief on in personam jurisdiction over Krupa; related conferences with Mr. Lightsey and Ms. Anna; follow up re discovery matters
3/3/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review response to Krupa's motion to dismiss for personal jurisdiction.
3/4/2020	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Review and revise draft brief re court jurisdiction over Krupa; related correspondence with Messrs Schapiro et al.; review final brief for filing
3/4/2020	Wallace Lightsey	1.00	\$650.00	\$ 650.00	Review and comment on memorandum in response to jurisdictional challenge
3/4/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Review response to Krupa's motion to dismiss for personal jurisdiction and provide comments to Mr. Schapiro and Mr. Hennies; confer with Mr. Hennies, Mr. Lightsey, and Mr. Winn regarding response.
3/5/2020	Marshall Winn	0.70	\$650.00	\$ 455.00	Receive and review supplementary filing by Krupa; review final draft of brief in support of personal jurisdiction over Krupa; arrangements for filing and service
3/5/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails with co-counsel re response to jurisdictional challenge
3/5/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Review Krupa's supplemental filing to reply; confer with Mr. Winn and Mr. Lakin regarding response to Krupa's jurisdictional motion to dismiss; review response to Krupa's jurisdictional motion to dismiss; confer with Mr. Winn, Mr. Lightsey, Mr. Schapiro, and Mr. Hennies regarding analysis regarding court's position towards case.
3/5/2020	Larry Roberson	0.10	\$235.00	\$ 23.50	Request archive of case documents from eDiscovery vendor (eClipse) in connection with migration to Everlaw
3/6/2020	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Filing and service of memorandum in support of jurisdiction over Krupa; related email communications with Mr. Schapiro; telephone conference and email communications with Mr. Paul; conference with Ms. Anna re follow up on production of documents by Swart/Crowds on Demand; email communications with Mr. Schapiro re telephone conference with counsel for Swart/Crowds on Demand re further production
3/6/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails with co-counsel re letter from Swart counsel re document production
3/6/2020	Rachael L. Anna	3.40	\$450.00	\$ 1,530.00	Review Crowds response to deficiency letter and documents cited in letter and prepare analysis related to letter; confer with Mr. Winn, Mr. Lightsey, Mr. Schapiro, and Mr. Lakin regarding Crowds discovery; confer with Ms. Davis regarding filing opposition to jurisdictional challenge; review opposition to jurisdictional challenge and assist with filing opposition to jurisdictional challenge; confer with Mr. Roberson regarding pending document production from Swart parties.
3/6/2020	Sarah Davis	1.30	\$230.00	\$ 299.00	Draft Certificate of Service to Mr. Krupa and letter transmitting filing to Mr. Krupa; Review and revise Plaintiff's Response to Krupa's Jurisdiction Challenge and exhibits for the same and prepare the same for filing with the Court; Prepare filed copies to be sent to Mr. Krupa via US Mail and Email.
3/7/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Mr. Roberson regarding pending document production from Swart parties.
3/10/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Review production by Swart/CoD; conferences with Ms. Anna and Mr. Schapiro re production by Swart/CoD
3/10/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with Mr. Wynn, Mr. Lightsey, Mr. Lakin, and Mr. Schapiro regarding Crowds response to deficiency a letter and supplemental document production.
3/11/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Email exchange re contacting contractors for fake protests
3/11/2020	Camden N. Massingill	0.30	\$375.00	\$ 112.50	Meeting with Rachael Anna regarding employment related discovery matters.
3/11/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Confer with Ms. Davis regarding investigating backgrounds of personnel associated with Crowds on Demand and review information found related to same; confer with Mr. Winn and Mr. Lightsey regarding ability to subpoena personnel associated with Crowds on Demand and strategy related to discovery.
3/11/2020	Sarah Davis	1.30	\$230.00	\$ 299.00	Research regarding Crowds on Demand business and employment of personnel.



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Date	Timekeeper	Hours	Rate	Amount	Narrative
3/12/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with Ms. Davis regarding hard copy receipt of supplemental filing to reply regarding jurisdiction; review information identified by Ms. Davis regarding personnel associated with Crowds on Demand; review information identified by Mr. Lakin in Swart document production.
3/12/2020	Larry Roberson	1.10	\$235.00	\$ 258.50	Analyze client documents & productions in connection with document review
3/13/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review request by Mr. Roberson regarding management of client documents; review receipt of supplementary document production by Swart parties.
3/13/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Review production in connection with document review; Communicate with R. Anna re: production
3/14/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Review new documents produced by Swart/Crowds on Demand; related conferences with Mr. Lightsey and Ms. Anna
3/14/2020	Rachael L. Anna	3.10	\$450.00	\$ 1,395.00	Review production information from opposing party; confer with Mr. Roberson regarding document production; review document production and prepare summary for Mr. Winn and Mr. Lightsey.
3/14/2020	Larry Roberson	1.50	\$235.00	\$ 352.50	Analyze SWART defendant production in connection with document review
3/15/2020	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Initial review of documents produced by Swart/Crowds on Demand; email communications with Mr. Schapiro et al. re strategy and pressure for full production
3/15/2020	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Email exchange re supplemental production from Swart and follow up on same
3/15/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with Mr. Winn and Mr. Schapiro regarding designation of confidential materials and implications; confer with Mr. Winn regarding preparing documents for Mr. Paul's review.
3/16/2020	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Email communications with and telephone conferences with Mr. Paul re discovery matters; email communications with Ms. Anna; review of documents produced; receive and review request for additional time by Krupa
3/16/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Confer with Mr. Winn regarding review of documents by Mr. Paul; confer with Mr. Roberson and Ms. Davis regarding preparing documents for Mr. Paul's review; confer with Mr. Paul regarding Crowds on Demand and Swart documents; confer with Mr. Paul regarding document review; review request for extension related to reply in support of jurisdictional challenge filed by Krupa.
3/16/2020	Larry Roberson	1.40	\$235.00	\$ 329.00	Analyze client documents in connection with review; Provide user access in Everlaw to D. Paul; Prepare case security permissions for the same
3/17/2020	Rachael L. Anna	0.80	\$450.00	\$ 360.00	Review court order denying Krupa's motion for extension related to reply to jurisdictional challenge; confer with Ms. Davis and Mr. Winn regarding court order; confer with Mr. Roberson regarding preparation of documents for review by Mr. Paul; confer with counsel for Swart parties regarding status of document production.
3/17/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Analyze client documents/productions in connection with streamlining document review
3/18/2020	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Documents review; related email communications with co-counsel; conferences with Mr. Paul
3/18/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Emails with co-counsel re Swart production and deposition
3/18/2020	Rachael L. Anna	3.40	\$450.00	\$ 1,530.00	Confer with counsel for Swart parties regarding supplement to document production; confer with Mr. Lakin, Mr. Winn, and Mr. Lightsey regarding Swart parties' deficiencies in document production; confer with Mr. Roberson regarding preparing materials for review by Mr. Paul; review materials produced by Swart parties and send key communications identified related to commissions to Mr. Winn for review.
3/18/2020	Larry Roberson	1.10	\$235.00	\$ 258.50	Communicate with client (D. Paul) re: creating notes in Everlaw; Prepare instructions for the same; Communicate with R. Anna re: the same; Archive client documents from Everlaw for preservation purposes
3/19/2020	Marshall Winn	1.50	\$650.00	\$ 975.00	Email communications with co-counsel re document review; attention to case administration re expenses incorrectly charged by QE
3/19/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Email exchange with co-counsel re Swart production
3/19/2020	Rachael L. Anna	2.60	\$450.00	\$ 1,170.00	Confer with Mr. Lakin regarding Swart parties' document production; confer with Mr. Roberson regarding Swart parties' document production and preparation of documents for review; confer with Mr. Paul regarding key communications regarding commissions to Krupa; review Swart document production.
3/19/2020	Larry Roberson	0.50	\$235.00	\$ 117.50	Examine Defendant production in connection with document review; Review activity in Everlaw

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Date	Timekeeper	Hours	Rate	Amount	Narrative
3/20/2020	Rachael L. Anna	2.70	\$450.00	\$ 1,215.00	Confer with S.Davis regarding identification of certain Swart emails for preparation of second deficiency letter and review documents related to same; review Reply in support of jurisdictional challenge filed by Krupa; review correspondence regarding supplemental document production by Swart parties; review documents produced by Swart parties.
3/20/2020	Rachael L. Anna	1.00	\$450.00	\$ 450.00	Review legal authority related to issues raised in deficiency letter to counsel for Swart parties.
3/20/2020	Sarah Davis	4.80	\$230.00	\$ 1,104.00	Receipt and review of case filings; Conduct searches within document productions for relevant files; Email communications with Ms. Anna regarding the same.
3/21/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on draft letter to opposing counsel re deficiencies in Swart production
3/21/2020	Rachael L. Anna	3.60	\$450.00	\$ 1,620.00	Review Swart document productions and draft letter to counsel for Swart parties regarding deficiencies in document production; confer with Mr. Winn and Mr. Lightsey regarding deficiencies.
3/22/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review comments from Mr. Winn and Mr. Lightsey regarding meet and confer with counsel for Swart Parties.
3/22/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Mr. Lakin regarding documents received from Swart parties.
3/23/2020	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Emails re Swart production; review Krupa reply memo
3/23/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Revise deficiency letter to counsel for Swart parties; confer with Mr. Lakin and Mr. Schapiro regarding deficiency letter; review information identified by Mr. Lakin in Swart parties document production.
3/23/2020	Larry Roberson	0.40	\$235.00	\$ 94.00	Analyze discovery documents in connection with streamlining access for review
3/24/2020	Wallace Lightsey	3.70	\$650.00	\$ 2,405.00	Email exchange with Rachael Anna and Marshall Winn re Swart production issues; review documents produced by Swart
3/24/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Telephone conference with counsel for Swart parties regarding deficiencies within document production; provide update to Mr. Winn, Mr. Schapiro, and Mr. Lightsey regarding telephone conference with counsel for Swart parties.
3/25/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Ms. Davis regarding reply brief to jurisdictional challenge.
3/26/2020	Marshall Winn	2.50	\$650.00	\$ 1,625.00	Review documents; conferences with Ms. Anna and Mr. Lightsey re Swart documents produced and deficiencies in document production; follow up with Ms. Anna re additional input
3/26/2020	Wallace Lightsey	2.10	\$650.00	\$ 1,365.00	Email exchange with Rachael Anna re document preservation by Swart; review production from Swart
3/26/2020	Rachael L. Anna	3.40	\$450.00	\$ 1,530.00	Search for communications referencing emails and prepare attachment to deficiency letter; revise deficiency letter to counsel for Swart parties; confer with Mr. Winn and Mr. Lightsey regarding deficiencies.
3/26/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Review document received from Pavol Krupa via Fed Ex; Email Communications with Mr. Winn regarding the same.
3/27/2020	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Review and comment on Rachael Anna draft letter to opposing counsel re Swart production deficiencies
3/27/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Review Swart production; review deficiency letter; review production of privilege log by Swart parties; confer with Mr. Winn and Mr. Lightsey regarding deficiency letter; confer with Mr. Lakin regarding privilege log produced by Swart parties and deficiency letter.
3/30/2020	Marshall Winn	0.50	\$650.00	\$ 325.00	Attention to deficiencies in Swart production
3/31/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review report and recommendation denying Krupa's challenge to personal jurisdiction; emails with co-counsel re same
3/31/2020	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Confer with Mr. Paul regarding documents produced by Swart parties; review opinion by court related to jurisdictional ruling; confer with Quinn Emanuel attorneys regarding future strategy.
3/31/2020	Sarah Davis	0.30	\$230.00	\$ 69.00	Receipt and review of Report and Recommendation of Judge Baker and email communications with attorneys regarding the same.
4/1/2020	Marshall Winn	2.30	\$650.00	\$ 1,495.00	Review and analysis of report and recommendation of magistrate judge in our favor; telephone conference with Mr. Schapiro and colleagues, Mr. Lightsey, Ms. Anna re analysis and next steps
4/1/2020	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Conference with co-counsel re next steps
4/1/2020	Rachael L. Anna	0.80	\$450.00	\$ 360.00	Telephone conferences with Mr. Winn, Mr. Schapiro, and Mr. Lightsey regarding strategy for litigation; review correspondence from opposing counsel regarding status of supplemental document production; review deadlines in agreement with Swart parties.
4/2/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review email from Rachael Anna re conversation with Swart counsel re production of ESI
4/2/2020	Rachael L. Anna	0.90	\$450.00	\$ 405.00	Review document production issues in preparation for meet and confer conference with opposing counsel; telephone conference with Mr. Alcantar regarding discovery disputes; draft summary of update on discovery disputes for Mr. Schapiro, Mr. Winn, and Mr. Lightsey; confer with Mr. Alcantar regarding extensions to settlement agreement and proposed submission to court.
4/3/2020	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Review Swart filing (status report and request for extension)

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Date	Timekeeper	Hours	Rate	Amount	Narrative
4/3/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review status report filed by counsel for Swart parties.
4/7/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review court order related to Swart parties and pending settlement.
4/8/2020	Rachael L. Anna	0.90	\$450.00	\$ 405.00	Confer with Mr. Winn and Ms. Jefferson regarding review of Swart document production; gather information for review by Ms. Jefferson for review of Swart documents; confer with Mr. Roberson regarding access to documents.
4/8/2020	Sarah Davis	0.60	\$230.00	\$ 138.00	Gather numerous case filings and transmit the same to attorneys for review.
4/9/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Mr. Lakin regarding Swart document production.
4/9/2020	Larry Roberson	0.30	\$235.00	\$ 70.50	Prepare search for images/video; Communicate the same with S. Davis
4/9/2020	Sarah Davis	6.70	\$230.00	\$ 1,541.00	Review Defendant Crowds on Demand's documents and images regarding coordinated protests.
4/10/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and respond to Rachael Anna re tags for document review
4/10/2020	Rachael L. Anna	1.50	\$450.00	\$ 675.00	Review Swart documents and complaint and draft document review instructions for attorney review; confer with Mr. Winn and Mr. Lightsey regarding instructions; review update from Ms. Davis regarding document review and analysis.
4/10/2020	Sarah Davis	4.50	\$230.00	\$ 1,035.00	Continue review of Defendant Crowds on Demand's documents and images regarding coordinated protests.
4/13/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Ms. Davis regarding document review coding for Swart document production.
4/13/2020	Sarah Davis	5.20	\$230.00	\$ 1,196.00	Continue review of Defendant Crowds on Demand's documents and images regarding coordinated protests.
4/14/2020	Sarah Davis	4.30	\$230.00	\$ 989.00	Continue review of Defendant Crowds on Demand's documents and images regarding coordinated protests.
4/20/2020	Sarah Davis	6.20	\$230.00	\$ 1,426.00	Continue review of Defendant Crowds on Demand's documents and images regarding coordinated protests.
4/21/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with opposing counsel regarding anticipated production of documents; review update from opposing counsel regarding document production; provide information to Mr. Winn regarding pending document production by Swart parties; review update from Ms. Davis regarding her review of documents in Swart parties' document production.
4/21/2020	Sarah Davis	4.20	\$230.00	\$ 966.00	Continue review of Defendant Crowds on Demand's documents and images regarding coordinated protests.
4/22/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review update from Ms. Davis regarding her review of documents in Swart parties' document production and follow-up with Ms. Davis regarding key information in production.
4/22/2020	Rachael L. Anna	4.90	\$450.00	\$ 2,205.00	Review communications produced by Swart parties for fact development; confer with Ms. Davis and Mr. Roberson regarding information within Swart document production and review information related to same.
4/22/2020	Sarah Davis	7.30	\$230.00	\$ 1,679.00	Continue review of Defendant Crowds on Demand's documents and images regarding protests; Confer with Ms. Anna regarding review findings.
4/23/2020	Rachael L. Anna	4.40	\$450.00	\$ 1,980.00	Review communications produced by Swart parties for fact development; confer with Ms. Davis and Mr. Roberson regarding information within Swart document production and review information related to same.
4/23/2020	Larry Roberson	1.00	\$235.00	\$ 235.00	Examine defendant productions in connection with locating attachments to text messages; Communicate the results to R. Anna
4/23/2020	Sarah Davis	2.30	\$230.00	\$ 529.00	Detailed review and analysis of text messages and corresponding attachments; Email correspondence with Ms. Anna and Mr. Roberson regarding the same.
4/24/2020	Rachael L. Anna	4.10	\$450.00	\$ 1,845.00	Review communications produced by Swart parties for fact development; confer with Ms. Davis regarding information within Swart document production.
4/25/2020	Rachael L. Anna	2.70	\$450.00	\$ 1,215.00	Review communications produced by Swart parties for fact development.
4/26/2020	Rachael L. Anna	2.40	\$450.00	\$ 1,080.00	Review production received from Swart parties; confer with Mr. Roberson regarding document production and metadata report; review communications from Swart for factual development.
4/27/2020	Rachael L. Anna	4.50	\$450.00	\$ 2,025.00	Review communications produced by Swart parties for fact development; confer with Mr. Roberson regarding Swart parties' supplemental document production and metadata report; confer with Mr. Lakin regarding status of settlement agreement and pending deadlines.
4/27/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Analyze Defendant production/re-production of documents in connection with document review; Prepare metadata report of the same; Email to R. Anna re: status update
4/28/2020	Rachael L. Anna	0.70	\$450.00	\$ 315.00	Confer with Mr. Roberson regarding Swart party production; review metadata report from Swart party production and documents.
4/28/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Analyze Defendant production/re-production of documents in connection with document review; Annotate documents in Everlaw re: document splits; Email to R. Anna re: the same

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Date	Timekeeper	Hours	Rate	Amount	Narrative
4/29/2020	Meliah B. Jefferson	2.30	\$445.00	\$ 1,023.50	Review pleadings and motion papers in preparation for conference with R. Anna and review of document production.
4/29/2020	Rachael L. Anna	2.20	\$450.00	\$ 990.00	Confer with Mr. Roberson regarding Swart party document review; prepare documents and searches for review by internal team; review documents produced by Swart parties; confer with Ms. Jefferson regarding Swart document production and provide relevant materials for review.
4/30/2020	Meliah B. Jefferson	0.50	\$445.00	\$ 222.50	Telephone conference with R. Anna regarding discovery and review of latest document production. Access database and review batch assignments.
4/30/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Review claims and factual development with Ms. Jefferson and provide additional information; review documents from Swart parties; review correspondence from counsel for Swart parties regarding status of production.
5/1/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with A. Schapiro regarding correspondence and discovery issue.
5/5/2020	Marshall Winn	1.20	\$650.00	\$ 780.00	Receive and review latest production from Swart/CoD; email communications with Ms. Anna; conference with Mr. Bakala
5/5/2020	Meliah B. Jefferson	2.50	\$445.00	\$ 1,112.50	Review Swart documents.
5/5/2020	Rachael L. Anna	0.80	\$450.00	\$ 360.00	Review correspondence from Swart's electronic discovery vendor; confer with Mr. Roberson regarding supplemental document production; review supplemental production; confer with Mr. Winn regarding Swart's document production.
5/5/2020	Larry Roberson	0.30	\$235.00	\$ 70.50	Examine Defendant production in connection with document review
5/6/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Confer with Mr. Winn regarding identification of sensitive information in Swart's production; confer with Mr. Lakin and with Mr. Schapiro regarding strategy; review documents produced by Swart to identify deficiencies and provide summary to Mr. Winn regarding same.
5/6/2020	Larry Roberson	1.10	\$235.00	\$ 258.50	Analyze confidential documents within defendants production
5/7/2020	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Review previous court orders; telephone conference with all counsel re status and proposed action; telephone conference with chambers of US District Judge re suggested action after Report and Recommendation of US Magistrate Judge
5/7/2020	Wallace Lightsey	1.30	\$650.00	\$ 845.00	Email exchange re recent document production; review documents and comment on same to Rachael Anna and Marshall Winn; review settlement agreement; conference with Marshall Winn; conference call with co-counsel to discuss action items
5/7/2020	Rachael L. Anna	7.50	\$450.00	\$ 3,375.00	Review and analyze documents produced by Swart parties; telephone conference with Mr. Schapiro, Mr. Lightsey, and Mr. Winn.
5/7/2020	Larry Roberson	1.20	\$235.00	\$ 282.00	Analyze confidential documents within defendants production
5/8/2020	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Receive and review order of US District Court denying Krupa's motion to dismiss for lack of personal jurisdiction; related conferences with co-counsel; email communications with Mr. Bakala; email communication with Mr. Paul
5/8/2020	Meliah B. Jefferson	3.80	\$445.00	\$ 1,691.00	Review Swart documents.
5/8/2020	Rachael L. Anna	6.70	\$450.00	\$ 3,015.00	Review Swart parties document production for factual development and preparation for Swart deposition; confer with Mr. Winn regarding request for information related to pending motion to strike.
5/8/2020	Larry Roberson	1.30	\$235.00	\$ 305.50	Analyze confidential documents within defendants production
5/8/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Receipt and review of case filing and emails with case team regarding the same.
5/9/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Review Swart parties document production for factual development and preparation for Swart deposition.
5/10/2020	Rachael L. Anna	1.60	\$450.00	\$ 720.00	Review Swart parties document production for factual development and preparation for Swart deposition.
5/11/2020	Marshall Winn	0.40	\$650.00	\$ 260.00	Initial review of documents and timeline with respect to follow up with court re motion to strike Krupa's answer
5/11/2020	Rachael L. Anna	7.10	\$450.00	\$ 3,195.00	Prepare materials requested by Mr. Winn regarding pending ruling on motion to strike for discussion with court; confer with Ms. Davis regarding docket entries; review Swart parties document production for factual development and preparation for Swart deposition.
5/12/2020	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Receive and review order granting our motion to strike answer and related pleadings filed by Krupa; email communications with fellow counsel re analysis and follow up; email communications with and telephone conference with
5/12/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and comment on order granting motion to strike; conference with Marshall Winn re strategy
5/12/2020	Rachael L. Anna	5.20	\$450.00	\$ 2,340.00	Review court order granting motion to strike; confer with Mr. Lightsey and Mr. Winn regarding court order; confer with Mr. Winn and Mr. Schapiro regarding case; review Swart parties document production for factual development and preparation for Swart deposition; confer with Ms. Davis regarding identification of key documents in Swart production.
5/12/2020	Sarah Davis	2.70	\$230.00	\$ 621.00	Review Swart parties document production and compare documents received with electronic transfer files.
5/12/2020	Sarah Davis	0.40	\$230.00	\$ 92.00	Receipt and review of Order and email to attorneys for review; Calculate case deadline and calendar the same for case team.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
5/13/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Analysis of facts in light of recent favorable rulings
5/13/2020	Rachael L. Anna	1.50	\$450.00	\$ 675.00	Review Swart parties document production for factual development and preparation for Swart deposition.
5/14/2020	Rachael L. Anna	3.10	\$450.00	\$ 1,395.00	Review Swart parties document production for factual development and preparation for Swart deposition
5/15/2020	Rachael L. Anna	3.60	\$450.00	\$ 1,620.00	Review summary prepared by Mr. Lakin and confer with Mr. Lakin regarding same; review Swart parties document production for factual development and preparation for Swart deposition; review legal authority related to privilege for purposes of challenging Swart designations.
5/16/2020	Rachael L. Anna	1.50	\$450.00	\$ 675.00	Review Swart parties document production for factual development and preparation for Swart deposition.
5/17/2020	Rachael L. Anna	5.10	\$450.00	\$ 2,295.00	Review Swart parties document production for factual development and preparation for Swart deposition.
5/18/2020	Meliah B. Jefferson	3.60	\$445.00	\$ 1,602.00	Review Swart documents.
5/18/2020	Rachael L. Anna	7.10	\$450.00	\$ 3,195.00	Analyze deficiencies from Swart document production; confer with Swart parties' vendor regarding privilege log; confer with Ms. Davis regarding identification of documents in Swart production; draft correspondence to opposing counsel regarding outstanding deficiencies; review Swart parties document production for factual development and preparation for Swart deposition.
5/18/2020	Sarah Davis	3.70	\$230.00	\$ 851.00	Review Swart parties document productions and analyze and compare electronic transfer files with documents produced; Confer with Ms. Anna regarding findings for the same.
5/19/2020	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Receive and review further production of documents from Swart and CoD; conferences with Mr. Lightsey and Ms. Anna; email communications with Mr. Schapiro; email communication with law clerk to Judge Norton re withdrawal and refiling of motion to amend RICO statement
5/19/2020	Wallace Lightsey	1.10	\$650.00	\$ 715.00	Review and comment on today's production by Swart; emails re same; review and comment on email from Court and comments re same
5/19/2020	Rachael L. Anna	11.40	\$450.00	\$ 5,130.00	Confer with Mr. Roberson regarding supplemental production; confer with Mr. Lakin regarding additional documents and privilege log produced by Swart parties; confer with Mr. Lightsey regarding key document produced by Swart; confer with Swart parties' electronic discovery vendor regarding production deficiencies; telephone conference with opposing counsel for Swart parties regarding settlement and status of document production deficiencies; review Swart parties document production for factual development and preparation for Swart deposition.
5/19/2020	Larry Roberson	2.10	\$235.00	\$ 493.50	Analyze defendant document production in connection with document review
5/20/2020	Marshall Winn	3.90	\$650.00	\$ 2,535.00	Attention to review of documents received from Swart/Crowds On Demand; related email communications with Messrs Lightsey and Schapiro and Ms. Anna; preparation for affidavit and deposition of Swart; related follow up; email communications with Mr. Daniel re related matters
5/20/2020	Wallace Lightsey	3.20	\$650.00	\$ 2,080.00	Email exchange re Swart production; analysis of financial records and payment amounts in same; review and revise motion to supplement RICO statement and proposed supplemental statement; email with opposing counsel re same; oversee refiling of motion to amend RICO statement; review and comment on outline for Swart affidavit
5/20/2020	Meliah B. Jefferson	1.70	\$445.00	\$ 756.50	Review Swart documents.
5/20/2020	Rachael L. Anna	9.60	\$450.00	\$ 4,320.00	Review RICO supplemental filing and motion requested by court; confer with Ms. Jefferson regarding documents produced by Swart parties; confer with S.Davis regarding court filing; confer with Mr. Paul regarding documents produced by Swart and search for documents related to Mr. Paul's inquiries; confer with Swart's counsel regarding status of settlement agreement and document production; confer with Mr. Lightsey and Mr. Winn regarding remaining document deficiencies and settlement agreement; confer with Mr. Roberson regarding supplemental production; confer with Swart's electronic discovery vendor regarding document production; review outline for Swart's affidavit and provide comments; confer with Mr. Lakin regarding Swart's supplementary production; analyze deficiencies from Swart document production; review Swart parties document production for factual development and preparation for Swart's affidavit and deposition; analyze and prepare records related to payments between Swart and Krupa's associates.
5/20/2020	Larry Roberson	0.30	\$235.00	\$ 70.50	Analyze defendant production in connection with document review
5/20/2020	Sarah Davis	3.70	\$230.00	\$ 851.00	Draft Notice of Withdrawal of Docket No. 48, Certificate of Service and file the same with the court; Review and revise Motion to Supplement RICO Case Statement, Exhibit A, Certificate of Service and file the same with the Court; Prepare service of all filed documents on Defendant Krupa by email and US mail.
5/21/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Review and analysis of documents produced by Swart and Crowds On Demand; related email communications with co-counsel



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Date	Timekeeper	Hours	Rate	Amount	Narrative
5/21/2020	Wallace Lightsey	0.90	\$650.00	\$ 585.00	Email exchange with co-counsel and David Paul re Swart documents; review revised financial analysis of Swart receipts and payments
5/21/2020	Rachael L. Anna	5.70	\$450.00	\$ 2,565.00	Review stopbakala.org website and documents for purposes of preparing Swart's affidavit; confer with Mr. Paul regarding evidence identified in Swart's documents; confer with Ms. Jefferson regarding document analysis; confer with Mr. Lakin regarding privilege designation issues by Swart; confer with Mr. Roberson regarding document analysis; confer with Mr. Lightsey regarding agreement related to designations; search for and identify materials for preparation of Swart's affidavit; review Swart parties document production for factual development and preparation for Swart deposition.
5/21/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Calculate response to motion due date and calendar the same for case team.
5/21/2020	Sarah Davis	0.10	\$230.00	\$ 23.00	Review emails regarding document review procedure
5/22/2020	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Review documents produced by Swart; email communications with co-counsel re analysis and follow up
5/22/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails with Rachael Anna, Marshall Winn and Andy Schapiro re Swart production and next steps
5/22/2020	Meliah B. Jefferson	4.80	\$445.00	\$ 2,136.00	Review Swart documents.
5/22/2020	Rachael L. Anna	4.90	\$450.00	\$ 2,205.00	Draft designation challenge procedure for Swart parties; confer with Swart's counsel regarding settlement agreement and status of document production; confer with Mr. Lakin regarding Swart's document production; review analysis from Mr. Paul; confer with Swart's electronic discovery vendor regarding Swart production; confer with Mr. Roberson regarding Swart's document production; confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding issues related to settlement with Swart parties and document production; review documents produced by Swart parties for purposes of preparing Swart's affidavit and upcoming deposition.
5/22/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Analyze Swart document production in connection with document review
5/25/2020	Marshall Winn	0.40	\$650.00	\$ 260.00	Email communications with Mr. Paul; email communications with co-counsel re confidential designations of documents produced by Swart
5/27/2020	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Review documents and analyses; correspondence with co-counsel re follow up and re correspondence with counsel for Crowds/Swart re extension of time so as to accommodate affidavit of Swart and deposition of Swart
5/27/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and comment on Swart's status report and request for extension; follow up emails re same; review and comment on notes on Swart documents
6/1/2020	Rachael L. Anna	0.70	\$450.00	\$ 315.00	Review analysis from D.Lakin regarding Swart parties' supplemental production and analysis from legal team regarding same; review correspondence from opposing counsel and status report filed with court; review Swart document productions and confer with Mr. Lightsey regarding certain documents; review correspondence update from Mr. Daniels.
6/2/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Attention to Krupa failure to file answer; conferences with co-counsel re entry of default and other strategy
6/2/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Email exchange re requesting entry of default against Krupa; review rule 55 and local rules re default judgment
6/2/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with Mr. Schapiro, Mr. Winn, and Mr. Lightsey regarding strategy for obtaining default judgment from Krupa; review status of court filings and Answer response date.
6/2/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Emails with Ms. Anna regarding case deadlines.
6/3/2020	Marshall Winn	1.20	\$650.00	\$ 780.00	Review documents; conferences with co-counsel re request for entry of default against Krupa
6/3/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Mr. Winn and Mr. Lightsey regarding strategy for hearing related to damages against Krupa.
6/3/2020	Sarah Davis	0.80	\$230.00	\$ 184.00	Draft and revise Plaintiff's Request for Clerk's Entry of Default and Certificate of Service for the same.
6/4/2020	Marshall Winn	0.90	\$650.00	\$ 585.00	Preparation of request for entry of default; conferences with co-counsel re timing and draft affidavit for Swart based on documents produced
6/4/2020	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Review and revise motion for entry of default; review docket and order granting motion to strike; emails re same
6/4/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review entry of default and confer with Mr. Lightsey, Mr. Winn, and Mr. Schapiro regarding same.
6/5/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review court filings and prior order of court
6/5/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review entry of default filing.
6/5/2020	Sarah Davis	1.50	\$230.00	\$ 345.00	Review and finalize Plaintiff's Request for Clerk's Entry of Default with Certificate of Service and prepare the same for filing with the Court; Execute service on Defendant Krupa via US Mail and Email.
6/8/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Email exchange re entry of default and order re RICO case statement



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Date	Timekeeper	Hours	Rate	Amount	Narrative
6/8/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review order granting entry of default and order providing additional time regarding RICO statement and confer with Mr. Lightsey, Mr. Winn, and Mr. Schapiro regarding same; confer with S.Davis regarding court order.
6/8/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Analyze documents in connection with reducing file size hosting totals
6/8/2020	Sarah Davis	0.50	\$230.00	\$ 115.00	Review Text Order of Judge Baker and docket responsive case deadlines for the same.
6/9/2020	Larry Roberson	1.00	\$235.00	\$ 235.00	Analyze documents in connection with reducing file size hosting totals
6/12/2020	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Review of documents and email communications with co-counsel and Mr. Paul re facts to be included in Swart affidavit
6/12/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on draft Swart declaration
6/12/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review draft Swart affidavit; confer with Mr. Lightsey and Mr. Winn regarding review of Swart affidavit.
6/15/2020	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Conferences with co-counsel and email communications with Mr. Paul re facts for Swart affidavit
6/15/2020	Rachael L. Anna	2.90	\$450.00	\$ 1,305.00	Review confidentiality designation issues with Mr. Winn and Mr. Lightsey; review documents related to designations; review draft Swart affidavit and search documents for information related to same; confer with Mr. Schapiro and Mr. Winn regarding Swart's draft affidavit.
6/16/2020	Rachael L. Anna	4.40	\$450.00	\$ 1,980.00	Review draft Swart affidavit and search documents for information related to same and prepare summary for Mr. Schapiro; review analysis from Mr. Paul regarding confidentiality designations; review documents identified as confidential; confer with Mr. Winn regarding Mr. Paul's analysis of designation issues; confer with Mr. Roberson regarding confidentiality designations; review documents and load files received from Swart parties to determine designations of documents; confer with Mr. Winn regarding designations.
6/16/2020	Larry Roberson	3.30	\$235.00	\$ 775.50	Analyze SWART document production in connection with classifying Confidential documents
6/17/2020	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Review documents produced by Swart; email communications with Mr. Paul; email communications with co-counsel re draft affidavit
6/17/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Email exchange and conference with Marshall Winn and Rachael Anna re Swart confidentiality designations and case strategy
6/17/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Review information prepared by Mr. Roberson regarding to Swart Parties production; confer with Mr. Paul and Mr. Roberson respectively regarding confidentiality designations; meeting and correspondence with Mr. Winn and Mr. Lightsey to review designation issues and strategy for resolution of settlement with Swart Parties.
6/17/2020	Larry Roberson	0.90	\$235.00	\$ 211.50	Analyze Swart confidential documents; Update the confidential document totals in Everlaw; Communicate the same to R. Anna
6/18/2020	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Review and comment on draft Swart declaration
6/18/2020	Rachael L. Anna	1.70	\$450.00	\$ 765.00	Confer with Mr. Lightsey and Mr. Paul regarding certain documents produced by Swart parties; provide information to Mr. Paul related to key documents; telephone conference with Mr. Paul to review challenges to designations; review draft Swart affidavit and other documents related to affidavit and provide comments to Mr. Schapiro.
6/19/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Emails with David Paul, Marshall Winn, and Rachael Anna re Swart declaration and un-designation of confidential-marked documents
6/19/2020	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Confer with Mr. Winn and Mr. Lightsey and Mr. Paul regarding draft Swart affidavit and designation challenge; review documents related to Swart affidavit in preparation for finalizing; confer with Mr. Paul regarding designation challenge.
6/20/2020	Marshall Winn	1.20	\$650.00	\$ 780.00	Review of documents; email communications with co-counsel; preparation of draft affidavit for Swart
6/20/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review documents identified by Mr. Paul related to challenging designations by Swart parties.
6/22/2020	Marshall Winn	3.70	\$650.00	\$ 2,405.00	Conferences with co-counsel; review documents; advise re strategy; telephone conference with clerk to US Magistrate Judge re resolution of Krupa default issues; conferences with co-counsel re preparation of motion for default judgment
6/22/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and respond to emails re revisions to draft Swart declaration and motion for default judgment
6/22/2020	Rachael L. Anna	2.50	\$450.00	\$ 1,125.00	Review revised draft Swart affidavit; confer with Mr. Schapiro regarding affidavit; confer with Ms. Christopher regarding preparation of Swart documents for review; confer with Mr. Winn regarding preparation of default judgment; confer with Mr. Paul regarding Swart Party documents and designation challenges; review Swart Party documents for designation challenges; research legal authority related to default judgments; review order from court related to RICO statement; review Mr. Winn's summary of telephone conference with court regarding status of Krupa and settlement with Swart Parties; review Mr. Schapiro's proposed strategy for resolving claims with Swart Parties.

## APPENDIX A

Date	Timekeeper	Hours	Rate	Amount	Narrative
6/22/2020	Sarah Davis	1.20	\$230.00	\$ 276.00	Index history of case deadlines, extensions granted and relevant motions filed in preparation of phone call with clerk's office for Mr. Winn.
6/23/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Confer with Mr. Paul regarding Swart Party documents and designation challenges; research legal authority related to default judgment in RICO case.
6/24/2020	Rachael L. Anna	1.90	\$450.00	\$ 855.00	Analyze documents and text messages to determine basis for challenging designations.
6/25/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Email exchange re Swart document production, deposition, and related matters
6/25/2020	Rachael L. Anna	1.80	\$450.00	\$ 810.00	Draft letter to counsel for Swart Parties regarding designations; confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding designations and strategy for preparation for Swart's deposition and default judgment.
6/26/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Email communications with and conferences with co-counsel re deposition of Swart and preparation for same
6/26/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding strategy for preparation for Swart's deposition.
6/28/2020	Rachael L. Anna	1.80	\$450.00	\$ 810.00	Review information for preparation of default judgment against Krupa.
6/29/2020	Rachael L. Anna	3.60	\$450.00	\$ 1,620.00	Review information for preparation of default judgment against Krupa.
6/29/2020	Sarah Davis	3.30	\$230.00	\$ 759.00	Review federal court docket and update case timeline for attorney review.
6/30/2020	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Preparation for deposition of Swart; related follow up with co-counsel
6/30/2020	Rachael L. Anna	6.60	\$450.00	\$ 2,970.00	Review information for preparation of default judgment against Krupa and draft default motion; confer with S.Davis regarding information needed for preparation of default judgment.
6/30/2020	Sarah Davis	3.60	\$230.00	\$ 828.00	Continue review of federal court docket and edit and revise case timeline for attorney review; Index supporting documentation for timeline.
7/1/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Emails with co-counsel re Swart deposition
7/1/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Mr. Townsend, Mr. Lightsey, Mr. Winn, and Ms. Christopher respectively regarding deposition setup.
7/2/2020	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Conference with all co-counsel and Mr. Paul re preparation for Swart deposition; follow up re related legal research; analysis of relevant procedural rules; correspondence from and to counsel for Swart and Crowds On Demand re agreement to their status report and request for extension of time to accommodate deposition; attention to issues re notice to Krupa
7/2/2020	Wallace Lightsey	2.90	\$650.00	\$ 1,885.00	Email exchange with Marshall Winn and Andy Schapiro re Swart deposition; conference call with Messrs. Schapiro, Lakin, Paul, Winn, and Ms. Anna re Swart deposition; follow up research on deposition notice formalities and timing and email co-counsel re analysis of same
7/2/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Attend strategy call with Mr. Schapiro, Mr. Paul, and Mr. Winn regarding Swart's deposition; confer with M.Winn and W.Lightsey regarding relevant rules related to depositions; confer with S.Davis regarding logistics for deposition of Swart.
7/2/2020	Sarah Davis	1.00	\$230.00	\$ 230.00	Draft Deposition Notice of Adam Swart; Email correspondence with Mr. Lightsey regarding the same.
7/5/2020	Rachael L. Anna	3.70	\$450.00	\$ 1,665.00	Draft default judgment motion and supporting affidavit materials.
7/5/2020	Sarah Davis	1.00	\$230.00	\$ 230.00	Draft letter to Counsel for Defendant Swart, Draft letter to Defendant Mr. Krupa; Serve Notice of Taking Deposition of Adam Swart on all Defendants by Email and US Mail.
7/6/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review correspondence from Swart counsel re redactions and confidentiality designations and related emails re same; review email from David Paul re Swart documents and deposition; review outline from David Paul and comment on same
7/6/2020	Rachael L. Anna	9.50	\$450.00	\$ 4,275.00	Draft default judgment motion and supporting materials; confer with S.Davis regarding information needed for preparation of default judgment.
7/6/2020	Sarah Davis	3.40	\$230.00	\$ 782.00	Review case docket and numerous Pro Hac Vice admissions to determine counsel representation; Gather all proofs of service throughout case history and confer with Ms. Anna regarding the same; Receipt and review of case filings and transmit the same to case team; Emails to Wyche personnel regarding set up of remote video deposition of Adam Swart.
7/7/2020	Wallace Lightsey	0.90	\$650.00	\$ 585.00	Review orders on motion to supplement RICO case statement; email co-counsel re filing supplemental statement; review of same; review and comment on draft motion for default judgment
7/7/2020	Rachael L. Anna	2.40	\$450.00	\$ 1,080.00	Draft default judgment motion and supporting materials; confer with S.Davis regarding information needed for preparation of default judgment; review correspondence from opposing counsel's ediscovery vendor; confer with Mr. Roberson and Mr. Lakin regarding supplemental production; confer with Mr. Lightsey regarding damages asserted in default judgment.
7/7/2020	Larry Roberson	2.00	\$235.00	\$ 470.00	Analyze defendant document production in connection with document review; Communicate with R. Anna re: the same
7/8/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with D.Lakin regarding supplemental production from Swart parties; review supplemental RICO filing.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
7/8/2020	Sarah Davis	1.00	\$230.00	\$ 230.00	Prepare Supplemental RICO Case Statement and draft Certificate of Service for filing with the Court; Draft cover letter and cause copies of the same to be delivered to Mr. Krupa by US Mail and email.
7/9/2020	Rachael L. Anna	1.60	\$450.00	\$ 720.00	Confer with litigation team regarding strategy for A.Swart's deposition; coordinate preparation of deposition setup; research issues related to damages for default judgment.
7/10/2020	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Preparation for Swart deposition; advice to Mr. Schapiro re DSC rules on depositions
7/11/2020	Marshall Winn	0.70	\$650.00	\$ 455.00	Review Ms. Anna's memorandum re motion for default judgment
7/11/2020	Rachael L. Anna	1.90	\$450.00	\$ 855.00	Review and revise default judgment; review cases related to RICO and default judgment; confer with Mr. Roberson and Mr. Townsend regarding preparation for Swart deposition; confer with Mr. Lightsey regarding default judgment.
7/13/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Preparation for deposition; email communications with Messrs Schapiro et al. re issues concerning affidavit and postponement of deposition
7/13/2020	Wallace Lightsey	1.90	\$650.00	\$ 1,235.00	Emails re Swart deposition and documents; review and comment on draft default judgment memo
7/13/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Review meet and confer correspondence from opposing counsel regarding designations; confer with Mr. Paul, Mr. Winn, and Mr. Lightsey regarding strategy for designations and privilege issues and review relevant designations; confer with L.Roberson regarding deposition preparation; confer with Mr. Schapiro regarding Swart's deposition.
7/14/2020	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Review and analysis of recently produced documents; review and advise re motion for default judgment; telephone conference with Mr. Schapiro (with Mr. Lightsey and Ms. Anna) re points for negotiation re Swart affidavit and preparation for Swart deposition
7/14/2020	Wallace Lightsey	1.70	\$650.00	\$ 1,105.00	Conference call with litigation team re Swart deposition and related items; review settlement agreement; review email from Rachael Anna re damages issue for default judgment; legal research re damages for defamation; email Rachael Anna re same
7/14/2020	Rachael L. Anna	6.40	\$450.00	\$ 2,880.00	Review legal authority and cases related to issues in the default judgment motion; review and revise default judgment; confer with Mr. Lightsey regarding issues related to default judgment; telephone conference with litigation team to discuss strategy related to Swart affidavit and deposition and default judgment.
7/16/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Telephone conference with Mr. Bakala re pending matters and confirmation of factual issues; follow up with co-counsel
7/16/2020	Rachael L. Anna	2.70	\$450.00	\$ 1,215.00	Review and revise default judgment and circulate with litigation team; confer with Mr. Schapiro regarding issues related to Swart parties document production; correspond with counsel for Swart parties regarding identification of key documents in document production.
7/17/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on draft default judgment memorandum
7/22/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review update from Mr. Schapiro regarding negotiations related to Swart Parties and discussion with litigation team regarding same.
7/24/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review QE revisions to memo in support of default judgment and comment on same
7/24/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review proposed changes to memorandum in support of default judgment from Mr. Schapiro and confer with Mr. Lightsey regarding same.
7/27/2020	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Email exchange with Andy Schapiro and David Paul re article on Krupa
7/27/2020	Rachael L. Anna	1.80	\$450.00	\$ 810.00	Revise memorandum in support of motion for default judgment; confer with S.Davis regarding draft motion for default judgment.
7/27/2020	Sarah Davis	2.00	\$230.00	\$ 460.00	Edit and revise Motion for Default Judgment; Confer with Ms. Anna regarding the same.
7/28/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on Czech news article re suit against Krupa; review Czech appeals court ruling in Serbina Consulting case
7/28/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review media reports of the case and confer with Mr. Winn regarding same.
7/29/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and comment on proposed confidentiality order
7/30/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and respond to email from Rachael Anna re thoughts on proposed confidentiality order
7/30/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Prepare materials to draft M.Winn declaration; review proposed confidentiality order and provide comments to litigation team for consideration of proposals by counsel for Swart parties.
7/31/2020	Rachael L. Anna	1.50	\$450.00	\$ 675.00	Draft M.Winn declaration; review with S.Davis information needed for M.Winn declaration.
8/3/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Ms. Davis regarding information required for drafting declaration for Mr. Winn.
8/3/2020	Sarah Davis	2.50	\$230.00	\$ 575.00	Research regarding attorney biographies in preparation of Declaration in Support of Motion for Default Judgment.
8/4/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Review information collected from S.Davis required for drafting declaration for Mr. Winn; revise Mr. Winn declaration.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
8/5/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Conferences with co-counsel and drafting of language for proposed order governing disclosure of confidential documents produced by Swart and Crowds on Demand; email communications with co-counsel re strategy
8/5/2020	Wallace Lightsey	0.80	\$650.00	\$ 520.00	Email exchange with Marshall Winn, Rachael Anna, and Andy Schapiro re proposed confidentiality order and motion for default judgment; review drafts for default judgment motion
8/5/2020	Rachael L. Anna	6.60	\$450.00	\$ 2,970.00	Draft motion for default judgment; revise memorandum in support of default judgment; draft declaration for Mr. Bakala; draft declaration for Mr. Winn; revise Confidentiality Order; draft consent motion for protective order; confer with Mr. Winn, Mr. Lightsey, and Quinn Emanuel team regarding confidentiality order; confer with Mr. Winn and Mr. Lightsey regarding draft default judgment and supporting affidavits; confer with opposing counsel regarding confidentiality order.
8/6/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Review proposed changes from Swart parties' counsel regarding confidentiality order and motion; confer with Mr. Winn and Ms. Davis regarding court filings.
8/7/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Review and revision of proposed order; attention to filing and service of same; related correspondence with co-counsel
8/7/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review revisions to confidentiality order and email exchange re same
8/7/2020	Rachael L. Anna	1.60	\$450.00	\$ 720.00	Confer with litigation team regarding proposed confidentiality order and motion; revise motion and confidentiality order; confer with opposing counsel regarding proposed order and motion; confer with S.Davis regarding preparing of documents for filing.
8/7/2020	Sarah Davis	1.50	\$230.00	\$ 345.00	Review Consent Motion for Confidentiality Order, Proposed Stipulated Confidentiality Order and Certificate of Service and prepare the same for filing with the Court; Email copies to Judge Baker; Send service copies to Mr. Krupa via email and US Mail.
8/10/2020	Sarah Davis	0.30	\$230.00	\$ 69.00	Receipt and review of case filings and emails with attorneys transmitting the same.
8/11/2020	Marshall Winn	0.40	\$650.00	\$ 260.00	Conferences with co-counsel re Swart affidavit
8/11/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review and comment on Swart revisions to draft declaration
8/12/2020	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Review Swart/Crowds comments on proposed affidavit; prepare response and revised document; advise re proposed court order extending Swart/Crowds time to answer
8/12/2020	Wallace Lightsey	0.70	\$650.00	\$ 455.00	Email exchange with co-counsel and opposing counsel re draft Swart declaration and motion for extension of time to answer
8/12/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review and revise memo in support of extension for Swart answer; email co-counsel re same
8/12/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Analyze electronic discovery document repository; Effect modifications to streamline upcoming upgrade
8/12/2020	Sarah Davis	1.10	\$230.00	\$ 253.00	Review email correspondence regarding Consent Motion for Extension; Draft Memorandum in Support of Motion for Extension.
8/13/2020	Marshall Winn	2.60	\$650.00	\$ 1,690.00	Analysis and revision of Swart declaration and review of related documentary support; telephone conference with co-counsel re follow up and further communication with counsel for Crowds/Swart
8/13/2020	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review draft Swart declaration and revisions to same; conference call with co-counsel re same
8/16/2020	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Attention to memorandum in support of motion for default judgment against Krupa; attention to draft declaration of Swart; related email communications with co-counsel
8/17/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Email exchange re Swart declaration and motion for default judgment
8/17/2020	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Review revisions by Swart's counsel to affidavit; review proposed changes to Swart affidavit by joint defense group; review documents filed with court regarding extension and confidentiality; confer with Mr. Winn and Mr. Lightsey regarding default motion and Swart affidavit; confer with Quinn Emanuel team regarding Swart affidavit.
8/18/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Review and comment on revised draft of Swart declaration; emails to Marshall Winn, Rachael Anna, and Andy Schapiro re same
8/18/2020	Rachael L. Anna	4.30	\$450.00	\$ 1,935.00	Review proposed changes to Swart affidavit by litigation team members; search for and identify documents in support of affidavit and provide analysis to litigation team; confer with Mr. Winn, Mr. Lightsey, and Quinn Emanuel team regarding Swart affidavit.
8/19/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Review Swart discovery materials and draft motion for default judgment; draft additional paragraphs for Swart declaration; related conferences with co-counsel
8/19/2020	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Review proposed changes to Swart affidavit by litigation team members; confer with Mr. Winn, Mr. Lightsey, and Quinn Emanuel team regarding Swart affidavit.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
8/20/2020	Marshall Winn	0.60	\$650.00	\$ 390.00	Follow up on modifications to draft Swart declaration; related conferences with co-counsel
8/20/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Email exchange re revision to Swart declaration; review and comment on revised draft of declaration
8/20/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review proposed changes to Swart affidavit by litigation team members; confer with Mr. Winn, Mr. Lightsey, and Quinn Emanuel team regarding Swart affidavit.
8/24/2020	Marshall Winn	0.40	\$650.00	\$ 260.00	Follow up re Swart declaration; related email communications with co-counsel
8/24/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Review update from opposing counsel regarding status of negotiations with Defendant Swart's affidavit.
8/27/2020	Marshall Winn	0.80	\$650.00	\$ 520.00	Email communications with co-counsel; telephone conference with co-counsel re response to Swart and Crowds counsel re declaration and deposition strategy
8/27/2020	Rachael L. Anna	1.40	\$450.00	\$ 630.00	Review opposing counsel's proposed revisions to Defendant Swart's affidavit; telephone conference with Mr. Winn and Quinn Emanuel team to review Swart's affidavit; review documents related to affidavit.
8/28/2020	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Telephone conference with Mr. Paul re factual investigation and review; email communications with Mr. Schapiro re Swart declaration and related issues; related email communications with co-counsel; further email communications with Mr. Schapiro following his exchange with counsel for Swart
8/28/2020	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Review response from opposing counsel's related to Defendant Swart's affidavit; confer with Mr. Winn and Quinn Emanuel team regarding status of deposition and affidavit.
8/29/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with Mr. Winn and Quinn Emanuel team regarding status of deposition and affidavit; review settlement agreement provisions related to deposition.
8/31/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review current draft of affidavit with portions of memorandum in support for default judgment.
9/1/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review proposed revisions to Swart declaration and emails with co-counsel re same
9/1/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Confer with Mr. Schapiro and Mr. Winn regarding documents for declaration; review revisions to declaration; search for documents in support of declaration.
9/3/2020	Marshall Winn	2.40	\$650.00	\$ 1,560.00	Email communications with Mr. Schapiro advising re negotiations with counsel for Swart/Crowds; related email communications with co-counsel; email communications with Mr. Schapiro re strategy for deposition of Swart; related review of documents and email communications with client; related arrangements for deposition
9/3/2020	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Email exchange with co-counsel re Swart deposition terms and conditions, notice and logistics
9/3/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Draft deposition notice and correspondence to Krupa and Swart's counsel; confer with Quinn Emanuel team, Mr. Lightsey, and Mr. Winn regarding deposition, parameters and topics for deposition, and notice to relevant parties; review revised version of affidavit.
9/4/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Emails with co-counsel re terms and conditions for Swart deposition
9/4/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Confer with S.Minor to review materials to be sent related to deposition notices; confer with Quinn Emanuel team, Mr. Lightsey, and Mr. Winn regarding deposition, parameters and topics for deposition, and notice to relevant parties; review revised version of affidavit.
9/5/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Emails with co-counsel re Swart deposition logistics, notice, and service of notice
9/5/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Confer with Quinn Emanuel team and Mr. Lightsey regarding deposition issues.
9/6/2020	Rachael L. Anna	0.50	\$450.00	\$ 225.00	Confer with D.Paul, Quinn Emanuel team, and Mr. Lightsey regarding deposition issues; review final revised affidavit.
9/7/2020	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Review current draft of Swart declaration; email exchange with co-counsel and deposition service re Swart deposition and preparation for same
9/8/2020	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Confer with Mr. Paul regarding affidavit issue; confer with Mr. Roberson regarding various depositions issues; assist with preparing materials for deposition.
9/9/2020	Marshall Winn	3.40	\$650.00	\$ 2,210.00	Preparation for deposition; related conferences with Mr. Schapiro
9/9/2020	Wallace Lightsey	1.20	\$650.00	\$ 780.00	Deposition preparation session with co-counsel; follow up emails re deposition logistics and strategy; review and comment on deposition outline
9/9/2020	Rachael L. Anna	6.30	\$450.00	\$ 2,835.00	Attend strategy meeting in preparation for Swart deposition and confer with litigation team regarding related issues; review and revise deposition outline; identify and prepare documents for deposition outline; confer with Mr. Lakin regarding certain documents; confer with litigation team regarding deposition outline.
9/9/2020	Larry Roberson	1.10	\$235.00	\$ 258.50	Participate in virtual deposition platform training (Veritext) in connection with deposition of A. Swart
9/10/2020	Marshall Winn	7.50	\$650.00	\$ 4,875.00	Preparation for and appearance at deposition of Adam Swart; related conferences with Mr. Lightsey, Ms. Anna, Mr. Schapiro, Mr. Paul; attention to remaining settlement matters re Swart and Crowds On Demand



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Date	Timekeeper	Hours	Rate	Amount	Narrative
9/10/2020	Wallace Lightsey	7.10	\$650.00	\$ 4,615.00	Prepare for Swart deposition; telephone conference with co-counsel re same; deposition; conferences with co-counsel during deposition and follow up afterwards
9/10/2020	Rachael L. Anna	7.70	\$450.00	\$ 3,465.00	Prepare logistics and materials for Swart deposition; strategy call with litigation team; attend Swart deposition.
9/10/2020	Larry Roberson	5.80	\$235.00	\$ 1,363.00	Assist W. Lightsey with exhibits & remote presentation technology during deposition of A. Swart
9/11/2020	Marshall Winn	3.90	\$650.00	\$ 2,535.00	Attention to matters relating to settlement with Swart and Crowds On Demand following Swart deposition; related email communications with and telephone conference with counsel for Swart and Crowds On Demand; negotiation of agreed status report and joint motion for extension and related court filings; email communications with Mr. Bakala re covenant not to execute and related settlement matters
9/11/2020	Wallace Lightsey	1.30	\$650.00	\$ 845.00	Emails with co-counsel re Swart settlement; review settlement agreement; review covenant not to execute; emails with co-counsel re same; review Marshall Winn email to Mr. Bakala re covenant and settlement
9/14/2020	Marshall Winn	3.40	\$650.00	\$ 2,210.00	Telephone conference with Mr. Paul re post-deposition steps and finalization of settlement with Swart/Crowds On Demand and use of materials; email communications with and telephone conference with Mr. Alcantar (counsel for Swart/Crowds) re certification of covenant not to execute; telephone conferences with Mr. Bakala re execution of covenant and re status; preparation of materials supporting motion for default judgment against Krupa; conferences with Ms. Anna re same
9/14/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review revised covenant not to execute and signed declaration of Adam Swart
9/14/2020	Rachael L. Anna	1.90	\$450.00	\$ 855.00	Review covenant not to execute and finalized affidavit for default judgment; review correspondence from opposing counsel regarding resolution against Swart parties; confer with Ms. Davis regarding resolution of issues with Swart parties; confer with Mr. Winn regarding preparation of information for affidavit in support of default judgment; confer with Mr. Schapiro regarding information required for Mr. Winn's affidavit and in support of default judgment.
9/14/2020	Sarah Davis	0.30	\$230.00	\$ 69.00	Review Text Order and calendar relevant deadlines for attorneys.
9/15/2020	Rachael L. Anna	1.20	\$450.00	\$ 540.00	Review information collected by Ms. Minor for default judgment and affidavit in support; confer with Ms. Minor and Ms. Constance regarding same regarding information required for affidavit in support of default judgment.
9/16/2020	Marshall Winn	0.70	\$650.00	\$ 455.00	Follow up re Swart/Crowds settlement documentation; correspondence with counsel for Swart
9/21/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Mr. Schapiro regarding information required for affidavit in support of default judgment.
9/24/2020	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Email communication; email communications with Mr. Lightsey and Mr. Paul; review of documents
9/24/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with Mr. Lakin, Mr. Winn, and Ms. Davis regarding Swart transcript and exhibits; download transcript and exhibits to system.
9/25/2020	Marshall Winn	1.80	\$650.00	\$ 1,170.00	Conferences with Messrs Lightsey and Schapiro re follow up on Swart declaration; receive and review original wet-signature Swart declaration; correspondence to counsel for Swart enclosing original wet-signature covenant not to execute and requesting revised claims for confidentiality; conference with Mr. Lightsey re motion for default judgment and related documents
9/25/2020	Wallace Lightsey	0.40	\$650.00	\$ 260.00	Email exchange with co-counsel re Swart declaration and providing original covenant to Swart counsel; compare declaration with prior versions
10/1/2020	Wallace Lightsey	0.30	\$650.00	\$ 195.00	Review notes and emails re action items for default judgment
10/5/2020	Rachael L. Anna	1.00	\$450.00	\$ 450.00	Review affidavit and revise memorandum in support of default motion/
10/6/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review update from opposing counsel and Mr. Winn regarding status of agreement with Swart parties and related confidentiality issues.
10/7/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review confidentiality designations; review protective order; email co-counsel re same
10/7/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review information from Mr. Lightsey regarding status of agreement with Swart parties and related confidentiality issues.
10/8/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Review information from Mr. Lakin regarding status of agreement with Swart parties and related confidentiality issues.
10/12/2020	Marshall Winn	0.70	\$650.00	\$ 455.00	Follow up re related matters
10/12/2020	Rachael L. Anna	1.30	\$450.00	\$ 585.00	Review information for affidavit and draft affidavit in support of default judgment.
10/13/2020	Rachael L. Anna	4.20	\$450.00	\$ 1,890.00	Review information for affidavit and draft affidavit in support of default judgment.
10/14/2020	Marshall Winn	2.30	\$650.00	\$ 1,495.00	Review Swart deposition and declaration; email communications in response to inquiries; related matters
10/15/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Follow up on confidentiality designations; conferences with Ms. Anna



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Date	Timekeeper	Hours	Rate	Amount	Narrative
10/15/2020	Rachael L. Anna	2.80	\$450.00	\$ 1,260.00	Meeting with Mr. Winn to discuss status of Krupa's misconduct and confidentiality designations by Swart parties; review information for affidavit and draft affidavit in support of default judgment; confer with Mr. Winn, Mr. Lightsey, and Mr. Schapiro regarding default judgment; confer with Mr. Lakin and Mr. Winn regarding redactions of Swart affidavit and transcript.
10/15/2020	Sarah Davis	1.20	\$230.00	\$ 276.00	Review Declaration of Adam Swart and Deposition Transcript of Adam Swart and apply redactions to privileged information; Emails with Ms. Anna regarding the same.
10/15/2020	Sarah Davis	0.20	\$230.00	\$ 46.00	Email correspondence with Mr. Winn and Ms. Anna transmitting Declaration of Marshall Winn.
10/16/2020	Rachael L. Anna	3.80	\$450.00	\$ 1,710.00	Confer with Mr. Lakin and Mr. Winn regarding redactions of Swart affidavit and transcript; confer with Mr. Roberson regarding confidentiality designations; review legal authority related to confidentiality designations; review Swart documents designated as confidential.
10/19/2020	Rachael L. Anna	3.90	\$450.00	\$ 1,755.00	Confer with Ms. Davis regarding confidentiality issues; telephone conference and correspond with Mr. Winn regarding information needed for default judgment; review information needed for default judgment briefing and exhibits; correspond with Ms. Hyman regarding research needed for default judgment; review affidavit, deposition transcript, and documents designated as confidential in preparation for designation challenge.
10/19/2020	Sarah Davis	4.20	\$230.00	\$ 966.00	Review letter from Defense regarding privileged materials; Update Everlaw database to reflect documents as privileged or undesignated as privileged; Email correspondence with Ms. Anna regarding the same.
10/20/2020	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Work on damages calculation for motion for default judgment; related research and conferences with colleagues
10/20/2020	McKinley H. Hyman	2.80	\$275.00	\$ 770.00	Legal research regarding civil RICO remedies
10/20/2020	Rachael L. Anna	2.80	\$450.00	\$ 1,260.00	Confer with Ms. Hyman regarding research required for default judgment motion and provide materials to assist with research; review documents to identify document to challenge designations; confer with Ms. Davis regarding confidentiality issues; provide materials to Mr. Paul for review as requested by Mr. Winn.
10/21/2020	Marshall Winn	1.90	\$650.00	\$ 1,235.00	Miscellaneous matters; conferences with Mr. Bakala re damages
10/21/2020	McKinley H. Hyman	4.00	\$275.00	\$ 1,100.00	Legal research regarding civil RICO remedies
10/21/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Confer with Ms. Hyman regarding research for default judgment; review research from Ms. Hyman for default judgment; confer with Ms. Davis regarding confidentiality issues.
10/21/2020	Sarah Davis	2.50	\$230.00	\$ 575.00	Review materials designated privileged by Defense and emails with Ms. Anna regarding the same.
10/22/2020	Marshall Winn	0.60	\$650.00	\$ 390.00	Follow up re default judgment matters
10/22/2020	McKinley H. Hyman	3.70	\$275.00	\$ 1,017.50	Legal research regarding civil RICO remedies
10/22/2020	Rachael L. Anna	0.40	\$450.00	\$ 180.00	Confer with Ms. Hyman regarding research for default judgment; review research memorandum from Ms. Hyman; confer with Mr. Winn and Mr. Paul regarding confidentiality designations.
10/23/2020	Marshall Winn	2.10	\$650.00	\$ 1,365.00	Work on declarations in support of motion for default judgment; related matters
10/23/2020	Rachael L. Anna	0.10	\$450.00	\$ 45.00	Confer with Mr. Winn regarding research performed by Ms. Hyman for default judgment.
10/28/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Ms. Hyman regarding confidentiality designations.
10/30/2020	Rachael L. Anna	0.80	\$450.00	\$ 360.00	Confer with Ms. Hyman regarding challenging confidentiality designations; confer with Mr. Winn regarding challenging confidentiality designations; confer with Mr. Schapiro and Mr. Winn regarding default judgment; confer with Ms. Minor regarding materials needed for confidentiality designations; confer with Mr. Roberson regarding document review
11/2/2020	McKinley H. Hyman	2.90	\$275.00	\$ 797.50	Legal research regarding de-designation of confidential documents; communications regarding the same
11/2/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with M. Hyman regarding confidentiality designations.
11/3/2020	McKinley H. Hyman	4.00	\$275.00	\$ 1,100.00	Legal research regarding de-designation of confidential documents
11/3/2020	Rachael L. Anna	0.30	\$450.00	\$ 135.00	Review status of default judgment with Mr. Winn and Mr. Schapiro; review translation of Krupa's comments to media about Bakala case.
11/4/2020	McKinley H. Hyman	2.10	\$275.00	\$ 577.50	Legal research and email correspondence regarding de-designation of confidential materials
11/5/2020	Marshall Winn	1.20	\$650.00	\$ 780.00	Telephone conference re RICO evidence matters; related follow-up
11/6/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Telephone conference with Mr. Alcantar (counsel for Swart and Crowds On Demand) re claims of confidentiality; email communications with Ms. Anna re final preparation of demand to lift confidentiality designations
11/6/2020	McKinley H. Hyman	1.40	\$275.00	\$ 385.00	Legal research regarding de-designation of confidential materials; communications regarding the same
11/6/2020	Rachael L. Anna	1.10	\$450.00	\$ 495.00	Confer with Ms. Hyman regarding confidentiality research; confer with Mr. Winn regarding status of confidentiality challenge and provide information to Mr. Winn regarding same; review documents related to confidentiality challenge.

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Date	Timekeeper	Hours	Rate	Amount	Narrative
11/7/2020	Marshall Winn	3.50	\$650.00	\$ 2,275.00	Draft declaration in support of motion for default judgment
11/8/2020	Wallace Lightsey	0.80	\$650.00	\$ 520.00	Review and revise draft declaration for Mr. Bakala in support of default judgment
11/8/2020	McKinley H. Hyman	2.60	\$275.00	\$ 715.00	Legal research regarding confidential designations
11/8/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Review revised drafts of Mr. Bakala declaration and comments from Mr. Lightsey and Mr. Winn regarding same.
11/9/2020	Marshall Winn	2.90	\$650.00	\$ 1,885.00	Revisions and conferences with Mr. Lightsey and Ms. Anna re declaration in support of default judgment; related email communications with Mr. Schapiro; preparation of declaration with respect to attorney fees
11/9/2020	Wallace Lightsey	4.30	\$650.00	\$ 2,795.00	Review complaint and motion materials; continue revision of Bakala declaration in support of default judgment; emails and conference with Marshall Winn re same; further review and revision of Bakala declaration; review and comment on Winn declaration
11/9/2020	McKinley H. Hyman	1.00	\$275.00	\$ 275.00	Legal research regarding confidential designations
11/9/2020	Rachael L. Anna	5.20	\$450.00	\$ 2,340.00	Review legal analysis and research from Ms. Hyman; review and revise draft Mr. Bakala declaration; review and revise draft Winn declaration; confer with Mr. Winn and Mr. Lightsey regarding draft declarations in support of default judgment; review case documents to provide information for draft declarations; confer with Mr. Schapiro regarding draft declarations in support of default judgment; review confidentiality designation issues.
11/10/2020	Marshall Winn	2.70	\$650.00	\$ 1,755.00	Attention to over broad assertion of confidentiality by Swart/Crowds; final revisions to declaration; related conferences with Mr. Lightsey and Ms. Anna; email communications with client
11/10/2020	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Conference with Marshall Winn and Rachael Anna re challenge to confidentiality designations
11/10/2020	McKinley H. Hyman	4.40	\$275.00	\$ 1,210.00	Draft de-designation letter; legal research regarding the same
11/10/2020	Rachael L. Anna	7.60	\$450.00	\$ 3,420.00	Review proposed joint status report and motion for extension of time; review confidentiality designations by Swart parties; confer with Ms. Hyman regarding confidentiality and privilege issues; meeting with Mr. Lightsey and Mr. Winn to review designation issues.
11/11/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Email communications with counsel for Swart/Crowds re motion for extension of time for their answer pending resolution of confidentiality questions; email communications with client re declaration; related follow up
11/11/2020	Wallace Lightsey	0.20	\$650.00	\$ 130.00	Review emails re extension and proposed consent motion for extension and comment on same
11/11/2020	McKinley H. Hyman	6.20	\$275.00	\$ 1,705.00	Draft de-designation letter; legal research regarding the same; identify relevant documents for de-designation
11/11/2020	Rachael L. Anna	7.50	\$450.00	\$ 3,375.00	Review confidentiality designations by Swart parties; confer with Ms. Hyman regarding confidentiality and privilege issues.
11/11/2020	Larry Roberson	3.90	\$235.00	\$ 916.50	Analyze Swart productions in connection to isolating the documents that were redacted or withheld from production as privileged; Communicate results to R. Anna
11/12/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Telephone conference with Mr. Paul re factual corrections; related conferences with co-counsel re status; receive and review filed consent motion for further extension by counsel for Swart and Crowds On Demand
11/12/2020	McKinley H. Hyman	5.80	\$275.00	\$ 1,595.00	Review privilege log and other items of discovery in preparation for de-designation notice; legal research regarding the same
11/12/2020	Rachael L. Anna	7.10	\$450.00	\$ 3,195.00	Confer with Ms. Hyman regarding legal authority related to challenging confidentiality designations; confer with Mr. Roberson regarding text messages produced by Swart parties and identification of documents designated as confidential; review messages identified as privileged by Swart parties; review documents designated as confidential; confer with Ms. Hyman regarding review of redacted documents.
11/12/2020	Larry Roberson	0.70	\$235.00	\$ 164.50	Analyze electronic productions in connection with locating key text message; Communicate the same with R. Anna; Apply electronic identifier updates to text message document in with facilitating document review
11/13/2020	McKinley H. Hyman	5.40	\$275.00	\$ 1,485.00	Review and prepare documents for de-designation notice
11/13/2020	Rachael L. Anna	4.30	\$450.00	\$ 1,935.00	Confer with Ms. Hyman regarding review of redacted documents and other documents designated as confidential; identify documents for review by Ms. Hyman; review documents to identify categories for designation challenges.
11/16/2020	Marshall Winn	1.00	\$650.00	\$ 650.00	Attention to removal of confidentiality designations
11/16/2020	McKinley H. Hyman	6.30	\$275.00	\$ 1,732.50	Review and prepare documents for de-designation notice
11/16/2020	Rachael L. Anna	5.30	\$450.00	\$ 2,385.00	Review designations and privilege issues; draft letter challenging designations by Swart parties; confer with Mr. Winn regarding privilege and confidentiality issues related to Swart parties.
11/17/2020	Marshall Winn	1.40	\$650.00	\$ 910.00	Attention to removal of confidentiality designations
11/17/2020	Wallace Lightsey	2.30	\$650.00	\$ 1,495.00	Review and revise draft letter challenging confidentiality designations; review documents at issue

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Date	Timekeeper	Hours	Rate	Amount	Narrative
11/17/2020	McKinley H. Hyman	2.30	\$275.00	\$ 632.50	Review redacted documents; revise chart
11/17/2020	Rachael L. Anna	5.40	\$450.00	\$ 2,430.00	Draft letter challenging designations by Swart parties; confer with Mr. Winn regarding privilege and confidentiality issues related to Swart parties; confer with Mr. Winn and Mr. Lightsey regarding draft letter challenging designations by Swart parties; prepare exhibits to letter challenging confidentiality designations; confer with counsel for Swart parties regarding challenges to designations.
11/18/2020	Marshall Winn	1.10	\$650.00	\$ 715.00	Attention to removal of confidentiality designations; related conferences with Ms. Anna; email communications with Mr. Alcantar (counsel for Swart and Crowds On Demand)
11/18/2020	Wallace Lightsey	0.60	\$650.00	\$ 390.00	Review revised challenge letter and exhibit to same; emails with Rachael Anna and Marshall Winn re same; review settlement agreement and confidentiality order re confidentiality designations and challenges
11/18/2020	Rachael L. Anna	0.80	\$450.00	\$ 360.00	Confer with Mr. Winn regarding documents; review documents and communications.
11/19/2020	Wallace Lightsey	0.10	\$650.00	\$ 65.00	Review and comment on revisions to Bakala declaration
11/19/2020	Rachael L. Anna	0.90	\$450.00	\$ 405.00	Confer with Ms. Davis regarding documents; review materials prepared by Ms. Davis; confer with Mr. Winn regarding documents; confer with Ms. Christopher regarding deadline for Swart parties to respond to designation challenges.
11/19/2020	Sarah Davis	0.70	\$230.00	\$ 161.00	Review privilege log and organize entries relating to specific individuals; Emails with Ms. Anna regarding the same.
11/20/2020	Marshall Winn	0.50	\$650.00	\$ 325.00	Conference with Mr. Bakala re declaration and status of litigation
11/20/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with Mr. Winn and Mr. Lightsey regarding information needed for motion for default judgment and attorneys fees.
11/23/2020	Marshall Winn	0.60	\$650.00	\$ 390.00	Email communications with Mr. Alcantar; conference with Ms. Anna re follow up on removal of confidentiality designations
11/23/2020	Rachael L. Anna	0.20	\$450.00	\$ 90.00	Confer with opposing counsel regarding designation challenges and meet and confer; confer with Mr. Winn regarding
11/24/2020	Marshall Winn	1.30	\$650.00	\$ 845.00	Conference with Ms. Anna; telephone conference with Mr. Alcantar re discovery issues; related follow up
11/24/2020	Rachael L. Anna	2.30	\$450.00	\$ 1,035.00	Meet and confer telephone conference with opposing counsel; confer with M.Winn regarding meet and confer; draft letter challenging deposition and affidavit designations; prepare exhibits to letter challenging designations.
11/25/2020	Rachael L. Anna	0.60	\$450.00	\$ 270.00	Confer with Mr. Winn regarding challenging designations to deposition transcript and affidavit; revise draft letter challenging deposition and affidavit designations; prepare exhibits to letter challenging designations; confer with opposing counsel regarding issues related to challenging designations.
12/8/2020	Marshall Winn	1.60	\$650.00	\$ 1,040.00	Telephone conference with counsel for Swart and Crowds On Demand (with Ms. Anna) re dedesignation of documents as confidential; follow up with Ms. Anna
12/9/2020	Wallace Lightsey	0.50	\$650.00	\$ 325.00	Review letter from Swart counsel re confidentiality designations; emails with Marshall Winn and Rachael Anna re same
12/10/2020	McKinley H. Hyman	4.10	\$275.00	\$ 1,127.50	Communications regarding discovery of documents; review privilege log for de-designation materials
		2087.90			

## APPENDIX B

Timekeeper Name	Work Date	Work Hrs	Narrative
Margaret Haas	8/21/2017	1.20	Read and review background documents.
Margaret Haas	8/22/2017	2.60	Review and analyze background documents and send summary to A. Schapiro.
Andrew H. Schapiro	8/23/2017	1.50	Review and analysis of background documents and associate's memo re same.
Andrew H. Schapiro	8/28/2017	0.50	Review and analysis of media articles sent by David Paul; email traffic.
Margaret Haas	8/28/2017	1.80	Read and analyze emails and interview transcripts sent by client.
Andrew H. Schapiro	8/30/2017	0.70	Email traffic re Swiss developments and possible responses.
Andrew H. Schapiro	8/31/2017	0.50	Emails re Swiss and Czech developments; consulting with M. Haas re same.
Andrew H. Schapiro	9/1/2017	1.80	Email from D. Paul; email from Z. Bakala; responsive email traffic to same; reviewing translation of Resolution 1603 of Czech Parliament sent by D. Paul; reading "Remembering OKD" article from MF Dnes circulated to team.
Andrew H. Schapiro	9/4/2017	1.00	Review and analysis of background information.
Margaret Haas	9/5/2017	1.80	Review and analyze emails from team; revise and edit cast of characters.
Andrew H. Schapiro	9/6/2017	0.50	Email traffic re billboards and related issues.
Andrew H. Schapiro	9/7/2017	1.00	Reviewing background materials.
Andrew H. Schapiro	9/8/2017	2.50	Reading various materials originally sent by D. Paul, and news/internet stories.
Andrew H. Schapiro	9/10/2017	0.70	Further review of background documents.
Andrew H. Schapiro	9/11/2017	2.00	Preparing for upcoming meetings.
Margaret Haas	9/11/2017	4.30	Review and analyze recent emails and publicity re matter; revise and edit summary documents, including cast of characters; create key document binder for A. Schapiro.
Andrew H. Schapiro	9/12/2017	2.50	Preparing for upcoming meetings.
Margaret Haas	9/12/2017	1.70	Confer with A. Schapiro re case; research law re potential claims.
Andrew H. Schapiro	9/13/2017	5.00	Dinner-meeting with M. Winn and D. Paul to discuss upcoming meetings and strategy; preparing for upcoming meetings.
Andrew H. Schapiro	9/14/2017	6.50	Meeting with Swiss lawyers and colleagues; follow up.
Andrew H. Schapiro	9/15/2017	2.80	Follow-up reading and review.
Andrew H. Schapiro	9/18/2017	1.00	Reviewing BMM monitoring summary of news items; follow up from Zurich meeting.
Andrew H. Schapiro	9/20/2017	1.00	Research
Margaret Haas	9/20/2017	1.40	Research potential claims re harassment, blackmail, and extortion; confer with A. Schapiro re case strategy.
Margaret Haas	9/22/2017	0.80	Research law re potential claims for blackmail, extortion, and harassment.
Andrew H. Schapiro	9/23/2017	1.30	Reviewing various circulated materials ("who's who," "transactions," emails to Krupa demonstrations, etc.).
Margaret Haas	9/24/2017	1.30	Research law re harassment, blackmail, and extortion; read and analyze cases and articles re same.
Andrew H. Schapiro	9/25/2017	2.20	Reviewing associate's research on potential extortion / blackmail claims; further work on same.
Margaret Haas	9/25/2017	0.40	Revise and send summary of potential harassment, extortion, and blackmail claims to A. Schapiro.
Andrew H. Schapiro	9/26/2017	2.50	Reviewing translation of submission by OKD administrator; reviewing Krupa history document; further consideration of potential extortion claim; reviewing article and related e-traffic.
Margaret Haas	9/26/2017	3.00	Confer re applications of RICO; draft summary and send to A. Schapiro.
Andrew H. Schapiro	9/28/2017	1.20	E-traffic and related documents re request for information; reviewing comments
Margaret Haas	9/28/2017	0.50	Confer with A. Schapiro re case strategy.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	9/29/2017	0.40	Reviewing weekly news summary circulated by client; internet searches related to same.
Margaret Haas	9/29/2017	3.00	Research law re civil RICO claim; read and analyze cases re same.
Andrew H. Schapiro	10/2/2017	0.50	Reviewing news stories.
Margaret Haas	10/2/2017	3.00	Legal research re potential claims against Pavol Krupa; confer with A. Schapiro re case strategy.
Andrew H. Schapiro	10/3/2017	1.50	E-traffic re Project
Andrew H. Schapiro	10/5/2017	2.00	Research re civil RICO.
Andrew H. Schapiro	10/6/2017	1.00	Emails from D. Paul re Switzerland; reviewing media-monitoring circulation.
Andrew H. Schapiro	10/9/2017	2.20	Further research/analysis re possible U.S. jurisdiction re Krupa and others.
Andrew H. Schapiro	10/10/2017	1.00	News stories, etc.
Andrew H. Schapiro	10/11/2017	1.30	Email traffic re Project follow up.
Margaret Haas	10/11/2017	0.90	Review and analyze documents and emails from team; update case binder for A. Schapiro.
Andrew H. Schapiro	10/13/2017	1.00	Phone call with David Paul; reading weekly media monitoring circulation and related stories.
Andrew H. Schapiro	10/16/2017	0.70	Reading news-monitoring documents
Andrew H. Schapiro	10/17/2017	0.50	E-mail traffic with David Paul
Margaret Haas	10/18/2017	1.40	Research law re defamation; draft summary and send to A. Schapiro.
Andrew H. Schapiro	10/20/2017	1.80	Media monitoring; Project - more background; email
Andrew H. Schapiro	10/23/2017	3.00	Reviewing analyses of parliamentary elections
Margaret Haas	10/23/2017	0.80	Read and analyze recent emails and press
Andrew H. Schapiro	10/24/2017	1.80	E-traffic with D. Paul; further reading re elections
Margaret Haas	10/24/2017	0.80	Read and analyze recent emails and press re Bakala, Babis, and Czech Republic; legal research re location of a "domestic injury" for purposes of a civil RICO action.
Andrew H. Schapiro	10/27/2017	0.50	Reading weekly media monitoring
Andrew H. Schapiro	10/30/2017	0.50	Reviewing documents
Andrew H. Schapiro	10/31/2017	1.50	E-mail traffic; further reading re coalition negotiations and post-election fallout
Andrew H. Schapiro	11/1/2017	1.30	Phone call with D. Paul and M. Winn; reviewing documents in preparation for same.
Andrew H. Schapiro	11/3/2017	0.70	Reviewing media-monitoring.
Andrew H. Schapiro	11/6/2017	0.50	Review & analysis of legal issues; review of weekly media monitoring
Andrew H. Schapiro	11/8/2017	0.30	Reading media monitoring document
Andrew H. Schapiro	11/9/2017	0.30	Media monitoring
Andrew H. Schapiro	11/10/2017	0.50	Media monitoring
Andrew H. Schapiro	11/13/2017	1.00	Reviewing draft text of proposed article circulated; reviewing other articles; emails
Andrew H. Schapiro	11/16/2017	0.50	Reading media monitoring
Andrew H. Schapiro	11/19/2017	0.40	Email traffic regarding meeting
Andrew H. Schapiro	11/20/2017	0.50	Email traffic re potential witness interviews; reviewing media monitoring
Andrew H. Schapiro	11/22/2017	1.00	Reading article by Babis about OKD and ZB circulated by D. Paul; reading published commentary by sociologist circulated to group
Andrew H. Schapiro	11/24/2017	0.50	Reading article
Andrew H. Schapiro	11/25/2017	3.00	Reviewing materials in preparation for upcoming meetings
Andrew H. Schapiro	11/26/2017	2.20	Prep for upcoming meetings
Andrew H. Schapiro	11/27/2017	4.00	Preparing for upcoming meetings

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Timekeeper Name	Work Date	Work Hrs	Narrative
Margaret Haas	11/27/2017	0.20	Confer with A. Schapiro re recent developments in case and preparation for upcoming meeting.
Andrew H. Schapiro	11/28/2017	3.50	Preparing for upcoming meetings, including review and analysis of memos
Margaret Haas	11/28/2017	5.60	Revise and edit research re civil RICO action; legal research re same; review and analyze recent emails and press re Zdenek Bakala.
Andrew H. Schapiro	11/29/2017	5.70	Preparing for upcoming meetings; conferring with M. Haas re same
Margaret Haas	11/29/2017	4.20	Meet with A. Schapiro re upcoming meeting; research law re civil RICO claims; research law re Foreign Sovereign Immunities Act; send summary re same to A. Schapiro.
Andrew H. Schapiro	11/30/2017	6.60	Meeting; preparing for upcoming meetings
Andrew H. Schapiro	12/1/2017	6.50	Meeting with client and co-counsel; prep for and followup to same
Andrew H. Schapiro	12/3/2017	1.00	Preparing for Monday meeting
Andrew H. Schapiro	12/4/2017	3.00	Meeting with client and other team members
Margaret Haas	12/5/2017	0.30	Confer with A. Schapiro re case strategy.
Margaret Haas	12/6/2017	1.30	Legal research re potential claims, defenses, and procedural rules.
Margaret Haas	12/8/2017	1.70	Legal research re potential claims and procedural rules.
Andrew H. Schapiro	12/12/2017	1.00	Reviewing accumulated media-monitoring reviews and news stories
Margaret Haas	12/18/2017	0.30	Legal research re potential claims and defenses.
Andrew H. Schapiro	12/19/2017	1.00	Catching up on media-monitoring circulations
Margaret Haas	12/19/2017	2.90	Legal research re potential claims against Pavol Krupa.
Andrew H. Schapiro	12/20/2017	2.50	Responding to inquiry from D. Paul; reviewing and revising memo re possible Civil RICO claim vs Krupa; conferring with M. Haas re same
Margaret Haas	12/20/2017	5.50	Revise and edit memorandum re civil RICO claim; confer with A. Schapiro re memorandum.
Margaret Haas	12/22/2017	2.90	Research jurisdiction and civil procedure matters related to potential civil RICO claim against Pavol Krupa.
Andrew H. Schapiro	1/2/2018	0.80	Media review, etc.
Andrew H. Schapiro	1/9/2018	1.00	Reviewing media-monitoring; reviewing materials
Andrew H. Schapiro	1/15/2018	0.50	Reviewing recently circulated media summaries, etc.
Andrew H. Schapiro	1/22/2018	0.70	Reviewing chronology
Andrew H. Schapiro	1/24/2018	1.00	Conference call with co-counsel; prep for and followup to same
Andrew H. Schapiro	1/28/2018	0.70	Review and analysis of post-election news
Andrew H. Schapiro	1/31/2018	1.00	Reviewing summaries
Andrew H. Schapiro	2/12/2018	1.50	Catching up on recent circulations & media-monitoring
Andrew H. Schapiro	2/23/2018	0.50	Reviewing recent news items and articles
Andrew H. Schapiro	3/6/2018	2.80	Reviewing / catching up on developments in CZ with regard to Babis, Zeman, etc
Andrew H. Schapiro	3/12/2018	1.40	Media circulations, news stories, etc.
Andrew H. Schapiro	3/16/2018	1.50	Reviewing weekly monitoring and other recent circulations and news items
Andrew H. Schapiro	3/19/2018	0.50	Reading article
Andrew H. Schapiro	3/23/2018	1.80	Reviewing email traffic from M. Bakala; assessing same; reading recent circulations and news articles in preparation for response and next steps
Andrew H. Schapiro	3/25/2018	1.00	Call with M. Winn re client request for call on strategy and developments
Andrew H. Schapiro	3/26/2018	1.50	Prep for upcoming client call; email from D Paul re same



## APPENDIX B

Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	3/27/2018	2.70	Conference call with client; prep call; prep and followup
Andrew H. Schapiro	3/28/2018	1.00	Call with David Paul; prep for and followup to same
Andrew H. Schapiro	4/3/2018	1.30	Reviewing media-monitoring circulation; call with David Paul
Andrew H. Schapiro	4/5/2018	0.30	Reviewing media-monitoring circulations
Andrew H. Schapiro	4/6/2018	1.50	Call with D. Paul re events in South Carolina; reviewing media monitoring
Andrew H. Schapiro	4/11/2018	0.30	Reviewing media-monitoring
Andrew H. Schapiro	4/13/2018	0.60	Reviewing recent media-monitoring
Andrew H. Schapiro	4/17/2018	0.20	Reviewing media-monitoring circulations
Andrew H. Schapiro	4/19/2018	0.30	Reviewing media-monitoring circulations
Andrew H. Schapiro	4/23/2018	0.20	Media-monitoring circulation
Andrew H. Schapiro	4/26/2018	2.50	Reviewing recent media-monitoring circulations; reviewing other news re developments in CZ; reviewing recent cases re extradition
Andrew H. Schapiro	4/27/2018	0.20	Weekly monitoring
Andrew H. Schapiro	5/2/2018	0.50	Media-monitoring circulations
Andrew H. Schapiro	5/3/2018	0.30	Media monitoring
Andrew H. Schapiro	5/4/2018	0.70	Media monitoring
Andrew H. Schapiro	5/7/2018	0.40	Media monitoring
Andrew H. Schapiro	5/8/2018	1.00	Call with D. Paul re case matters
Andrew H. Schapiro	5/9/2018	1.00	Reviewing coverage re developments
Andrew H. Schapiro	5/10/2018	0.30	Circulation re monitoring
Andrew H. Schapiro	5/11/2018	0.50	Media-monitoring
Andrew H. Schapiro	5/15/2018	0.30	Reading monitoring circulation
Andrew H. Schapiro	5/18/2018	0.60	Reviewing recent monitoring circulations
Andrew H. Schapiro	5/22/2018	0.50	Recent media monitoring circulations
Andrew H. Schapiro	5/24/2018	0.30	Reading circulations
Andrew H. Schapiro	5/25/2018	0.50	Daily monitoring and weekly monitoring; reading article sent by David Paul
Andrew H. Schapiro	5/29/2018	0.30	Recent monitoring circs
Andrew H. Schapiro	5/31/2018	0.20	Reading monitoring summary
Andrew H. Schapiro	6/8/2018	0.30	Reading recent monitoring circulations
Andrew H. Schapiro	6/12/2018	0.20	Media-monitoring circulations
Andrew H. Schapiro	6/15/2018	0.30	Media monitoring circulations
Andrew H. Schapiro	6/19/2018	0.20	Monitoring circs
Andrew H. Schapiro	6/22/2018	0.30	Media-monitoring
Andrew H. Schapiro	6/26/2018	0.60	Email exchanges with D. Paul re emails to Aspen Institute; media-monitoring
Andrew H. Schapiro	6/27/2018	0.40	Followup re Aspen issues; e-traffic re same
Andrew H. Schapiro	6/29/2018	0.20	Circulations re monitoring
Andrew H. Schapiro	7/2/2018	0.50	Aspen-board emails issue; researching options
Andrew H. Schapiro	7/4/2018	1.00	Analyzing annotated screenshots from the stopbakala.org website and a letter sent by Arca Capital to Duff and Phelps, sent by David Paul; email correspondence re same
Andrew H. Schapiro	7/5/2018	0.80	Review & analysis of documents sent by David Paul re Krupa's threats

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	7/10/2018	0.50	Inquiry from D. Paul re new developments; consideration of and response to same
Andrew H. Schapiro	7/11/2018	1.50	Further exchanges with D. Paul re Aspen & Crowds on Demand; e-traffic and internal meeting re potential claims; review and analysis of memos and materials
David Lakin	7/11/2018	2.00	Meeting re: Background information, reviewing research and memos
David Lakin	7/11/2018	3.50	Researching elements of tort claims in various states
Margaret Haas	7/11/2018	2.50	Confer with A. Schapiro and S. Swedlow re case strategy; confer with D. Lakin re case background; review and analyze recent correspondence re developments in case.
Andrew H. Schapiro	7/12/2018	1.50	Formulating (and discussing) strategy for complaint against Krupa, Swart, and Crowds On Demand
David Lakin	7/12/2018	3.70	Researching elements of tort claims in various states and personal jurisdiction issues
Margaret Haas	7/12/2018	6.50	Review and analyze key documents re potential claims; confer with A. Schapiro and D. Lakin re potential claims; draft and revise complaint.
Andrew H. Schapiro	7/13/2018	2.00	Reviewing D. Lakin's findings re jurisdictional issues and elements of tort claims potentially at issue here; preliminary review of first draft of complaint
David Lakin	7/13/2018	4.00	Researching personal jurisdiction issues
Margaret Haas	7/13/2018	5.40	Draft and revise complaint; confer with D. Lakin re legal research for potential claims.
Stephen Swedlow	7/13/2018	1.30	Analyze state law elements of tort law claims; review evidence of extortion and defamation compiled to date.
David Lakin	7/15/2018	1.80	Complaint research
Andrew H. Schapiro	7/16/2018	1.00	Reviewing Tuck/Dartmouth materials sent by D. Paul and M. Winn's letter to Tuck; conferring with D. Lakin re claims for draft Complaint
David Lakin	7/16/2018	5.60	Editing complaint and researching civil rico
Margaret Haas	7/16/2018	0.30	Confer with A. Schapiro and D. Lakin re case strategy.
Stephen Swedlow	7/16/2018	1.40	Analyze Swart related evidence for potential claims; review draft complaint.
Andrew H. Schapiro	7/17/2018	2.00	Conferring with QE team re theory and strategy for draft Complaint; email traffic re same; reviewing materials related to same
David Lakin	7/17/2018	10.50	Editing complaint and researching Civil RICO
Andrew H. Schapiro	7/18/2018	3.00	Editing and revising draft Complaint
David Lakin	7/18/2018	7.80	Editing complaint and researching Civil RICO
David Lakin	7/18/2018	0.50	Further edits on Complaint
Andrew H. Schapiro	7/19/2018	2.70	Reviewing documents sent by D Paul; finalizing and circulating draft Complaint
David Lakin	7/19/2018	1.50	Preparing cover email for complaint and reviewing complaint
Margaret Haas	7/19/2018	0.20	Confer with D. Lakin re legal research.
Andrew H. Schapiro	7/20/2018	2.00	Conference call with D. Paul and M. Winn; followup to same; reviewing documents sent by D. Paul
David Lakin	7/20/2018	1.50	Preparing for phone call, phone call with client, and following up on next steps with team
Margaret Haas	7/20/2018	1.60	Telephone conference with A. Schapiro, S. Swedlow, D. Lakin, David Paul, and Marshall Winn re case strategy; review and analyze draft complaint.
Andrew H. Schapiro	7/26/2018	0.30	Reviewing communications from D. Paul
Andrew H. Schapiro	7/27/2018	0.50	Reviewing recent media-monitoring circulations
Andrew H. Schapiro	7/30/2018	0.30	Media-monitoring circs, etc.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	8/2/2018	0.80	Reviewing article and video clip sent by D. Paul re Omaha and NYC "protests"; assessment of impact and potential next steps; e-mail exchanges with D. Paul and others re same
Andrew H. Schapiro	8/3/2018	0.50	Reviewing weekly monitoring; further email traffic re Swart's group
Andrew H. Schapiro	8/6/2018	0.50	Reviewing media-monitoring circulations
Andrew H. Schapiro	8/9/2018	1.00	Media-monitoring circs; email traffic and review re Hilton Head "protest"
David Lakin	8/9/2018	2.00	Personal jurisdiction research
Margaret Haas	8/9/2018	0.30	Review and analyze recent correspondence re case.
Andrew H. Schapiro	8/10/2018	0.30	Conferring with M. Haas & D. Lakin re potential federal lawsuit in South Carolina
David Lakin	8/10/2018	0.60	personal jurisdiction research and meeting with team
Margaret Haas	8/10/2018	0.80	Confer with A. Schapiro and D. Lakin re case strategy; revise and edit complaint.
Margaret Haas	8/12/2018	2.50	Revise and edit complaint; research law re personal jurisdiction.
Andrew H. Schapiro	8/13/2018	1.00	Analyzing questions sent by DP re next steps
Margaret Haas	8/13/2018	1.90	Revise and edit complaint; research law re personal jurisdiction.
Andrew H. Schapiro	8/14/2018	1.50	Research re FARA issue; reviewing videos sent by DP; e-traffic re jurisdiction issue
Margaret Haas	8/14/2018	3.70	Research issues re case strategy; send summary of research re case strategy to A. Schapiro.
Andrew H. Schapiro	8/15/2018	2.80	Conference call; documents from DP; revising draft Complaint
Stephen Swedlow	8/15/2018	0.80	Analyze recent materials received from David Paul.
Andrew H. Schapiro	8/16/2018	1.50	Analyzing material sent by DP, including communications between Swart and Duff & Phelps and Krupa's latest website; meeting with QE team re strategy for lawsuit
David Lakin	8/16/2018	1.70	Meeting with Bakala team and follow up research
Andrew H. Schapiro	8/17/2018	1.00	NYC "protest" video from NYC; email from DP; media-monitoring circulations
David Lakin	8/18/2018	1.00	Research into defamation claim in South Carolina
David Lakin	8/19/2018	9.00	Editing Bakala complaint, researching South Carolina defamation law, researching tortious interference with a nonprofit relationship, researching potential civil right of action based on email harrassment/ongoing email fraud
Margaret Haas	8/19/2018	0.50	Telephone conference with D. Lakin re revised complaint and case strategy.
Andrew H. Schapiro	8/20/2018	2.20	Reviewing DP's edits to new draft; researching Hague Convention issues
David Lakin	8/20/2018	5.00	Editing Bakala complaint to include new emails and defamation developments
Margaret Haas	8/20/2018	4.10	Revise and edit draft complaint; confer with D. Lakin re research and case strategy.
Stephen Swedlow	8/20/2018	1.20	Analyze revisions to complaint and research on international service issues under Hague and Rule 4f.
Katherine B. Fuller	8/20/2018	0.70	Process materials for complaint exhibits.
Andrew H. Schapiro	8/21/2018	3.00	Meeting with QE team; revising complaint
David Lakin	8/21/2018	4.00	Editing Bakala Complaint
Margaret Haas	8/21/2018	4.50	Confer with A. Schapiro re case strategy and draft complaint; revise and edit draft complaint to incorporate edits from A. Schapiro.
Andrew H. Schapiro	8/22/2018	1.70	Reviewing W. Lightsey's markup of draft; comments/markup from DP; background material
David Lakin	8/22/2018	1.00	editing complaint
Margaret Haas	8/22/2018	3.10	Revise and edit draft complaint to incorporate edits from David Paul and Wallace Lightsey.
Stephen Swedlow	8/22/2018	0.50	Analyze proposed revisions to complaint.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	8/23/2018	1.00	Editing; e-traffic
Margaret Haas	8/23/2018	3.20	Revise and edit draft complaint to incorporate edits from David Paul and Wallace Lightsey.
Andrew H. Schapiro	8/24/2018	1.50	Conf call with client; reviewing materials sent by DP
David Lakin	8/24/2018	1.30	Conference call with Bakala team and putting together research plan for defamation discovery
Margaret Haas	8/24/2018	3.70	Telephone conference with Quinn team, David Paul, and Wyche team re draft complaint and case strategy; research law re pendent jurisdiction, defamation claims, and other issues.
Stephen Swedlow	8/24/2018	1.10	Conference call with David Paul and Marshall Winn to discuss complaint filing strategy, claims and timing.
David Lakin	8/25/2018	2.50	Researching cases and drafting memo re: defamation discovery in South Carolina
Margaret Haas	8/25/2018	2.20	Revise and edit draft complaint to account for edits from call with David Paul and Wyche attorneys.
David Lakin	8/26/2018	6.00	Researching cases and drafting memo re: defamation discovery in South Carolina
Margaret Haas	8/26/2018	1.10	Revise and edit draft complaint; confer with D. Lakin re research into defamation issues.
Andrew H. Schapiro	8/27/2018	2.50	Editing and circulating new draft; reviewing and analyzing memo re defamation claims and related discovery issue
David Lakin	8/27/2018	2.00	Researching cases and editing memo re: defamation discovery in South Carolina
Margaret Haas	8/27/2018	3.00	Revise and edit draft complaint to incorporate edits from A. Schapiro and to incorporate recent events.
Andrew H. Schapiro	8/29/2018	0.50	Email from DP re continued harassment; media-monitoring circulations
Andrew H. Schapiro	8/31/2018	1.00	Email from M Winn re planned "stop the crooks" demonstration in Prague; media-monitoring circulations; further review
Andrew H. Schapiro	9/1/2018	0.30	Email from D. Paul; e-traffic re same
Andrew H. Schapiro	9/2/2018	0.50	Blesk article (translated) and Czech Forbes article re Krupa
Andrew H. Schapiro	9/3/2018	0.70	Reviewing DP comments re Complaint and email re Krupa Facebook posts re Kraft/Heinz
Stephen Swedlow	9/3/2018	0.80	Analyze complaint revisions and recent correspondence from David Paul.
Andrew H. Schapiro	9/4/2018	2.50	E-traffic and call; internal team meeting; review and analysis of RICO issues
David Lakin	9/4/2018	2.00	Strategy meeting with team and researching questions re: defamation per se and choice of law provisions
Margaret Haas	9/4/2018	1.00	Meet with A. Schapiro, S. Swedlow, and D. Lakin re revisions to complaint and case strategy; confer with D. Lakin re revisions to complaint.
Andrew H. Schapiro	9/5/2018	2.00	Reviewing comments from co-counsel; assessing input from RICO specialists; calls and emails re Complaint
David Lakin	9/5/2018	2.50	Research re: tortious interference, punitive damages, and defamation choice of law
Katherine B. Fuller	9/5/2018	0.60	Review and revise complaint re: exhibit citations.
Andrew H. Schapiro	9/6/2018	2.50	Call with M. Pitt and M. Winn; reviewing materials; working on Complaint
David Lakin	9/6/2018	6.00	Continued research re: tortious interference, punitive damages, and defamation choice of law; reviewing exhibits and cite checking
Margaret Haas	9/6/2018	3.60	Revise and edit complaint; read and analyze information sent by David Paul, Marshall Winn, and others on team.
Katherine B. Fuller	9/6/2018	2.70	Review and revise complaint re: exhibit citations (1.9); review and process complaint exhibits (.8).

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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	9/7/2018	5.00	Continued research re: tortious interference, punitive damages, and defamation choice of law; reviewing exhibits and cite checking
Margaret Haas	9/7/2018	0.20	Confer with D. Lakin re legal research to update complaint.
Andrew H. Schapiro	9/9/2018	2.00	Editing Complaint.
David Lakin	9/9/2018	2.60	Compiling exhibits for complaint and cite checking all exhibits in complaint
Andrew H. Schapiro	9/10/2018	1.20	Reviewing translated documents re Krupa's involvement in criminal complaint; analyzing RICO
David Lakin	9/10/2018	5.00	Compiling exhibits and editing exhibits for complaint; cite checking all exhibits in complaint
Katherine B. Fuller	9/10/2018	1.30	Review and revise exhibits to complaint.
Andrew H. Schapiro	9/11/2018	1.50	Comments on Complaint; e-traffic re Krupa's role at Arca
David Lakin	9/11/2018	6.00	Finishing research and drafting email re: tortious interference, punitive damages, and defamation choice of law; Compiling exhibits and editing exhibits for complaint; cite checking all exhibits in complaint
Margaret Haas	9/11/2018	0.20	Confer with D. Lakin re updates to complaint and exhibits.
Stephen Swedlow	9/11/2018	0.70	Complaint review and revisions.
Katherine B. Fuller	9/11/2018	0.50	Review and revise complaint exhibits.
Andrew H. Schapiro	9/12/2018	2.50	Calls re and with lawyers; comments from Daniel and Martin; reviewing summary of Zaoralek case; working on Complaint
David Lakin	9/12/2018	6.00	Finalizing exhibits for complaint; cite checking all exhibits in complaint
Margaret Haas	9/12/2018	1.30	Draft and circulate research re service of process on Pavol Krupa.
Katherine B. Fuller	9/12/2018	0.90	Review and revise exhibits to complaint.
Andrew H. Schapiro	9/13/2018	3.00	Materials from DP re Tuck calls and emails; working on Complaint
David Lakin	9/13/2018	1.00	Adding in new exhibits for complaint
Stephen Swedlow	9/13/2018	0.50	Analyze revisions to civil RICO allegations in the complaint draft.
Andrew H. Schapiro	9/14/2018	2.50	Correspondence with DP; revising Complaint
Andrew H. Schapiro	9/16/2018	1.50	Reviewing materials on RICO prerequisites, for Complaint
Andrew H. Schapiro	9/17/2018	4.50	Meeting with lawyers; working on Complaint
Andrew H. Schapiro	9/18/2018	5.50	Team meeting; revising and circulating Complaint
David Lakin	9/18/2018	3.00	Revising complaint per edits and comments from attorneys and D. Paul
Margaret Haas	9/18/2018	1.00	Meet with Quinn team re finalization of complaint; confer with D. Lakin re edits to complaint; confer with K. Fuller re service of process.
Katherine B. Fuller	9/18/2018	0.30	Review and summarize procedures re: service.
Katherine B. Fuller	9/19/2018	1.30	Draft pro hac vice applications (.6); review rules and practices re: attorney admissions and process servers (.7).
Andrew H. Schapiro	9/20/2018	7.50	Working on Complaint; call with MW re same; call with DP, ZB, MW re same and re strategy
David Lakin	9/20/2018	6.00	Revising complaint/inserting edits; strategy call with the team
David Lakin	9/20/2018	0.20	Creating a redline between two complaints
Stephen Swedlow	9/20/2018	1.30	Complaint revisions; teleconference to finalize complaint filing strategy.
Katherine B. Fuller	9/20/2018	0.50	Review and revise pro hac vice applications.
Andrew H. Schapiro	9/21/2018	8.50	Reviewing and implementing suggestions from DP, ZB and Daniel; further revisions to Complaint; finalizing and overseeing filing of Complaint

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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	9/21/2018	7.00	Editing and revising complaint; preparing complaint for filing
Margaret Haas	9/21/2018	1.30	Review and revise draft complaint; confer with D. Lakin re edits to complaint.
Katherine B. Fuller	9/21/2018	0.90	Review and revise complaint for filing (.5); review and summarize rules re: filing requirements (.4).
Andrew H. Schapiro	9/24/2018	1.00	Correspondence re service and re press inquiries
David Lakin	9/24/2018	4.10	Researching address for Swart/Crowds on Demand, method for service of summons, discussing Rule 4f motion
David Lakin	9/24/2018	1.10	Discussing best method of service with K. Fuller; A. Schapiro; and M. Haas
Margaret Haas	9/24/2018	0.20	Confer with D. Lakin re service of complaint.
Katherine B. Fuller	9/24/2018	0.70	Review and summarize service information and summons for process server (.7).
Andrew H. Schapiro	9/25/2018	1.20	More re service and media; call with MW
David Lakin	9/25/2018	0.50	Addressing A. Swart service issues.
David Lakin	9/25/2018	0.50	Discussing service issues and Judge Norton with Bakala team
Margaret Haas	9/25/2018	0.30	Confer with D. Lakin re service of complaint.
Katherine B. Fuller	9/25/2018	0.50	Process materials for service (.2); review and finalize pro hac vice applications (.3).
Andrew H. Schapiro	9/26/2018	0.50	Email traffic re various issues
David Lakin	9/26/2018	0.30	Addressing Bakala service issues
Katherine B. Fuller	9/26/2018	0.30	Process materials for service and correspond w/ vendor re: same.
Andrew H. Schapiro	9/27/2018	1.50	Call; followup; reviewing press coverage of lawsuit, including Krupa comments
Andrew H. Schapiro	9/28/2018	1.50	Excerpts from Krupa's Soukup interview; reviewing detailed email re Complaint; Swart service issues.
Katherine B. Fuller	9/28/2018	0.40	Review and summarize rules re: service.
Andrew H. Schapiro	10/1/2018	1.50	Reviewing revised Soukup extract; working on amended complaint
David Lakin	10/1/2018	4.00	Drafting Bakala litigation hold and following up re: service
Andrew H. Schapiro	10/2/2018	2.00	Reviewing draft litigation-hold notice; info from D. Paul; working on draft amended complaint
David Lakin	10/2/2018	2.00	Researching FRCP re: amended complaint
Andrew H. Schapiro	10/3/2018	2.00	Working on amended complaint
Katherine B. Fuller	10/3/2018	0.20	Review and revise pro hac vice applications.
Andrew H. Schapiro	10/4/2018	1.00	Editing amended complaint; e-correspondence re same
David Lakin	10/4/2018	4.00	Drafting amended complaint
Andrew H. Schapiro	10/5/2018	1.50	Reviewing new draft of complaint; correspondence with D. Paul, C. McShane, others re press inquiry
David Lakin	10/5/2018	4.00	Drafting amended complaint
Andrew H. Schapiro	10/7/2018	3.20	Editing new draft; correspondence re same
Stephen Swedlow	10/7/2018	1.20	Analyze amended complaint and Krupa interview.
Andrew H. Schapiro	10/8/2018	2.00	Call with MW; speaking with reporter; further revision of new draft complaint
David Lakin	10/8/2018	3.50	Amending Bakala Complaint
Andrew H. Schapiro	10/9/2018	2.00	Reviewing Omaha press coverage; reviewing recent "monitoring" circulations; implementing suggested edits; email exchange re amended complaint
David Lakin	10/9/2018	1.20	Revising Amended Complaint Draft
Andrew H. Schapiro	10/11/2018	2.50	Reviewing calls; reviewing and implementing suggested edits; finalizing and filing amended complaint



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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	10/11/2018	5.00	Revising Amended Complaint, Reviewing Amended Complaint, and preparing Amended Complaint for filing
David Lakin	10/11/2018	0.50	Researching service re: Swart and Crowds on Demand for an Amended Complaint
David Lakin	10/12/2018	5.10	Researching Rule 4 and Rule 5 for service of Amended Complaint; Arranging for service of Amended Complaint
Andrew H. Schapiro	10/15/2018	0.50	Recent "monitoring" circulations; email traffic re Zeman and Krupa
David Lakin	10/15/2018	1.00	Researching Rule 4 and Rule 5 service issues for Amended Complaint
Andrew H. Schapiro	10/16/2018	0.50	Conference re press inquiry; "monitoring" circulation
David Lakin	10/16/2018	0.50	Completing Service of Amended Complaint via first class mail
Andrew H. Schapiro	10/17/2018	2.20	Conference call re serving Krupa; review / analysis of Krupa interview transcript
David Lakin	10/17/2018	1.00	Conference call re: Service of Krupa and Rule 4 research follow-up
Margaret Haas	10/17/2018	0.30	Review and analyze recent correspondence in case; confer with D. Lakin re case strategy.
Andrew H. Schapiro	10/18/2018	0.50	Correspondence from opposing counsel; research re opposing counsel; email traffic
Andrew H. Schapiro	10/19/2018	1.00	Internal meeting re strategy for service of process; email traffic
David Lakin	10/19/2018	0.50	Meeting re: service of Krupa
Margaret Haas	10/19/2018	1.10	Research law re service of process pursuant to Hague Convention; confer with others in Quinn Emanuel re best process servers for international service of process; meet with A. Schapiro and D. Lakin re case strategy.
Stephen Swedlow	10/19/2018	1.20	Analyze recent correspondence.
Andrew H. Schapiro	10/20/2018	0.50	Catching up on news stories, etc
Andrew H. Schapiro	10/22/2018	1.00	Followup research re service-of-process issues; "monitoring" circulation
Margaret Haas	10/22/2018	1.40	Review and analyze recent correspondence re case; confer with process server re Hague Convention process; confer with legal team re Hague Convention service of process.
David Lakin	10/23/2018	3.00	Researching Krupa service issues; researching Swart and Crowds on Demand service issues; editing service documents; reviewing summons
Margaret Haas	10/23/2018	0.10	Confer with team re service of process.
David Lakin	10/24/2018	0.60	Service follow up research; conversing with team re: Rule 4 service issues
Margaret Haas	10/24/2018	0.30	Confer with attorneys re translation of supporting documents.
Andrew H. Schapiro	10/25/2018	2.50	Call re with M Winn, D Paul and W Lightsey re upcoming meeting; reviewing documents sent by DP for Saturday meeting; "monitoring" circulation
David Lakin	10/25/2018	0.50	Reviewing documents for Saturday meeting
Andrew H. Schapiro	10/27/2018	2.30	Call with ZB and South Carolina lawyers to prep for meeting; prep for and followup to same; call from M Winn and W Lightsey to report back on meeting
Andrew H. Schapiro	10/30/2018	1.00	Reviewing full translation of Krupa interview sent by D. Paul; "monitoring" circulation
David Lakin	10/30/2018	1.50	Researching Crowds on Demand recent activity and reading background on Swart
Margaret Haas	10/30/2018	0.10	Read and analyze recent correspondence re case.
Katherine B. Fuller	10/30/2018	0.20	Review and process press materials re: litigation.
Andrew H. Schapiro	10/31/2018	0.50	Attention to issues re Hague Convention and service
David Lakin	10/31/2018	1.10	Addressing Rule 4f service issues; researching partial settlement agreements
Margaret Haas	10/31/2018	0.60	Read and respond to recent correspondence re service of process via Hague Convention.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Katherine B. Fuller	10/31/2018	0.60	Review and summarize rules re: international service and certified copies.
Andrew H. Schapiro	11/1/2018	0.60	Reviewing Wyche's memo re meeting; email re Hague service; "monitoring" circulation
David Lakin	11/1/2018	0.50	Conferring with C. Bryant and K. Fuller re: obtaining certified copies of court documents for Rule 4 service
David Lakin	11/2/2018	1.40	Researching partial settlement agreements; Researching and circulating email re: Crowds on Demand involvement in New Orleans City Council incident
Andrew H. Schapiro	11/6/2018	1.00	Email from D Paul; reviewing attachments; conferring with colleagues re same
Andrew H. Schapiro	11/7/2018	0.50	Conferences re claim; research re same
Andrew H. Schapiro	11/8/2018	1.50	Call with D Paul and others re proposal. Reviewing draft letter; e-traffic re same
David Lakin	11/8/2018	0.20	Researching when Defendants' Motion To Dismiss is due
Andrew H. Schapiro	11/9/2018	0.50	New draft
David Lakin	11/13/2018	1.30	Starting review of Motion to Dismiss
Katherine B. Fuller	11/14/2018	0.50	Process motion to dismiss briefing for review (.5).
Andrew H. Schapiro	11/15/2018	2.50	Review and analysis of Swart's Motion To Dismiss; QE team meeting re same
David Lakin	11/15/2018	4.20	Reviewing Motion to Dismiss and all exhibits
David Lakin	11/15/2018	1.50	Bakala team meeting; researching 6-month list; conferring with C. Hennies re strategy
Margaret Haas	11/15/2018	2.10	Team meeting with A. Schapiro, S. Swedlow, and D. Lakin re recent developments in case; read and analyze recent correspondence and press re case.
Stephen Swedlow	11/15/2018	1.20	Analyze motion to dismiss.
Andrew H. Schapiro	11/16/2018	1.50	Further review/analysis of MTD; call with M. Winn et al.; followup email from M. Winn
David Lakin	11/16/2018	2.80	Bakala team meeting; researching motion to stay cases
Carl Hennies	11/16/2018	1.60	Conference with DL regarding current status of case and motion to dismiss; review Crowds' motion to dismiss.
David Lakin	11/17/2018	3.00	Researching motion to stay cases in 4th Circuit and District of South Carolina
Carl Hennies	11/17/2018	6.20	Legal research regarding motion to stay motion to dismiss briefing until all defendants have been served.
Andrew H. Schapiro	11/18/2018	0.50	Email from D Paul re followup; reviewing research from Carl H re potential stay of proceedings
David Lakin	11/18/2018	0.30	Conferring with C. Hennies re: Motion to stay
Carl Hennies	11/18/2018	1.40	Prepare memo explaining results of research into whether courts stay motions to dismiss pending service of all parties; legal research regarding same; review correspondence regarding same.
Andrew H. Schapiro	11/19/2018	0.50	Reviewing D. Paul's comments re Motion to Dismiss; email traffic re stay issue
David Lakin	11/19/2018	1.50	Reviewing motion to stay and discussing motion with C. Hennies
Stephen Swedlow	11/19/2018	1.20	Analyze arguments in opposition to MTD including jurisdictional arguments and motion to stay draft.
Carl Hennies	11/19/2018	5.60	Review amended complaint; draft motion to stay proceedings until Krupa has been served; correspond with team regarding draft motion.
Andrew H. Schapiro	11/20/2018	0.50	Edits to stay app; email traffic re same
David Lakin	11/20/2018	1.10	Conducting legal research for motion to stay
Carl Hennies	11/20/2018	1.10	Review and revise motion to stay; conference with team regarding same; legal research on motion to stay.
David Lakin	11/21/2018	0.40	Reviewing Motion to Stay

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Timekeeper Name	Work Date	Work Hrs	Narrative
Carl Hennies	11/21/2018	0.30	Review correspondence regarding motion to stay and motion for extension of time.
Andrew H. Schapiro	11/23/2018	1.00	RICO "enterprise" research
Andrew H. Schapiro	11/26/2018	0.20	E-traffic re minor changes to proposal
Carl Hennies	11/26/2018	1.40	Review motion to dismiss materials and comments on motion to dismiss.
Carl Hennies	11/27/2018	2.20	Legal research regarding civil RICO claims.
Carl Hennies	11/28/2018	2.20	Legal research regarding civil RICO claims.
Andrew H. Schapiro	11/29/2018	0.50	Reviewing/editing stay application; e-traffic re same
Carl Hennies	11/29/2018	4.10	Correspond with team regarding finalizing motion for stay; legal research regarding alternative service under Rule 4(f)(3); prepare memo to team on alternative service; correspond with team regarding alternative service.
Carl Hennies	11/30/2018	0.30	TC with DL regarding motion to stay; correspond with team regarding seeking extension of time based on denial of stay motion.
Carl Hennies	12/1/2018	6.20	Legal research regarding civil RICO claims.
Carl Hennies	12/2/2018	2.10	Legal research regarding civil RICO claims.
Andrew H. Schapiro	12/3/2018	2.70	Working on Preliminary Statement and Facts for opp brief; reviewing news and "monitoring" updates
Carl Hennies	12/3/2018	3.50	Legal research regarding civil RICO claim.
Andrew H. Schapiro	12/4/2018	1.50	Conferring with QE team re RICO-brief assignments; initial work on brief; emails and calls re judge's request for telephonic conference on stay application
David Lakin	12/4/2018	6.10	Researching Civil RICO predicate acts in response to Defendant's Motion to Dismiss.
Margaret Haas	12/4/2018	0.50	Research law re domestic injury requirement of RICO.
Stephen Swedlow	12/4/2018	1.50	Analyze civil RICO pattern requirement research and compare to alleged facts.
Carl Hennies	12/4/2018	3.50	Correspond with team regarding assignments for motion to dismiss response; legal research regarding civil RICO claims; TC regarding telephone status conference on motion to stay.
Andrew H. Schapiro	12/5/2018	2.50	Pre-call re court conf; telephonic with judge; followup; memo re "pattern" from Carl H
David Lakin	12/5/2018	3.10	Attending telephonic hearing and summarizing hearing; Reviewing Crowds on Demand's MTD, researching cases, and beginning Civil RICO analysis
Margaret Haas	12/5/2018	2.50	Research law re domestic injury requirement; read and analyze cases re same.
Stephen Swedlow	12/5/2018	0.90	Analyze RICO case statement requirement and continuity research.
Katherine B. Fuller	12/5/2018	0.20	Update files to reflect full docket.
Carl Hennies	12/5/2018	6.60	Legal research regarding civil RICO claims; correspond with team regarding hearing on motion to stay; search D.S.C. website for standing order on RICO cases; prepare memo outlining law on RICO's continuity requirement; review court's order on RICO interrogatories.
David Lakin	12/6/2018	2.80	Reviewing cases cited to in Defendant's Motion to Dismiss and beginning Civil RICO analysis
Margaret Haas	12/6/2018	1.10	Research law re domestic injury requirement; read and analyze cases re same.
Carl Hennies	12/6/2018	4.20	Legal research regarding civil RICO.
Andrew H. Schapiro	12/7/2018	0.50	Memo from Carl H re extortion and predicate acts
Margaret Haas	12/7/2018	3.20	Research law re civil RICO claims; read and analyze cases re same.
Carl Hennies	12/7/2018	5.60	Legal research on civil RICO; correspond with team regarding prior research; prepare memo to team on predicate act for RICO purposes.
Andrew H. Schapiro	12/10/2018	0.50	Material from Carl H re pattern / continuity

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Timekeeper Name	Work Date	Work Hrs	Narrative
Margaret Haas	12/10/2018	1.60	Research law re RICO domestic injury and injury to business or property.
Carl Hennies	12/10/2018	2.90	Legal research on continuity and correspond with team regarding same.
Andrew H. Schapiro	12/11/2018	1.00	Reviewing material from Margaret H re US commerce and injury
Margaret Haas	12/11/2018	0.90	Research law re civil RICO.
David Lakin	12/12/2018	2.80	Reviewing Civil RICO research; researching Civil RICO pattern
Margaret Haas	12/12/2018	0.10	Confer with Quinn team re case strategy.
Carl Hennies	12/12/2018	0.50	Review research on RICO damages and interstate commerce requirement; correspond with DL regarding RICO statement.
Andrew H. Schapiro	12/13/2018	0.50	More back-forth re pattern/continuity
David Lakin	12/13/2018	3.80	Conferring with Bakala team re: Civil RICO requirements, researching Civil RICO predicate act requirements
Stephen Swedlow	12/13/2018	0.90	Factual analysis of continuity RICO requirements
Carl Hennies	12/13/2018	6.00	Correspond with team regarding amending complaint; TC with DL; legal research regarding operation or management of RICO enterprise.
Andrew H. Schapiro	12/17/2018	0.50	Reviewing recent "monitoring" circulations
David Lakin	12/17/2018	4.80	Researching Civil RICO predicate acts and analyzing Defendants' MTD section on predicate acts.
Margaret Haas	12/17/2018	3.30	Research law re civil RICO claims; read and analyze cases re same.
Andrew H. Schapiro	12/18/2018	3.00	Team meeting; working on issues re brief
David Lakin	12/18/2018	7.40	Meeting with Bakala team re: MTD response; continuing Civil RICO research and drafting analysis of MTD on Civil RICO predicate acts
Margaret Haas	12/18/2018	4.30	Research law re civil RICO claims; read and analyze cases re same; confer with A. Schapiro, S. Swedlow, and D. Lakin re case strategy.
Carl Hennies	12/18/2018	4.40	TC with team regarding response to Crowds' motion to dismiss; review motion to dismiss and amended complaint, and related legal research.
Andrew H. Schapiro	12/19/2018	1.50	E-traffic re residence issue; material from MW and WL re progress; "predicate" research from Lakin
David Lakin	12/19/2018	9.60	Cumulating research on Civil RICO predicate acts, developing argument, and distinguishing Defendants' cases.
Margaret Haas	12/19/2018	6.10	Research law re civil RICO; read and analyze cases re same; draft and revise research summary re civil RICO; confer with D. Lakin re civil RICO cases.
Stephen Swedlow	12/19/2018	1.20	Analyze Norton specific civil Rico case law; correspondence re required injury.
Stephen Swedlow	12/19/2018	0.70	Predicate acts research analysis.
Carl Hennies	12/19/2018	7.70	Legal research and prepare draft motion to response on Bakala sufficiently alleging a pattern of racketeering activity.
Andrew H. Schapiro	12/20/2018	3.00	Reviewing draft brief from Wyche; working on brief
David Lakin	12/20/2018	3.70	Continuing Civil RICO predicate act research; conferring with M. Haas re: same
Margaret Haas	12/20/2018	8.10	Research law re civil RICO; read and analyze cases re civil RICO; draft and revise opposition brief.
Stephen Swedlow	12/20/2018	1.20	Draft opposition to motion to dismiss.
Carl Hennies	12/20/2018	3.10	Review Wyche draft response to summary judgment motion review teams emails; prepare section of response on continuity.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	12/21/2018	2.50	Reviewing sections and markup from M. Haas; working on brief
David Lakin	12/21/2018	1.30	Reviewing draft of MTD response
Margaret Haas	12/21/2018	1.60	Revise and edit draft brief in opposition to motion to dismiss.
Carl Hennies	12/21/2018	0.80	Prepare draft section on continuity for response brief; review drafts circulated by team.
Carl Hennies	12/22/2018	0.20	Review correspondence.
Andrew H. Schapiro	12/23/2018	2.50	New section on multiple predicates from Carl H; working on draft
Carl Hennies	12/23/2018	1.80	Prepare section of response to motion to dismiss on multiple predicate acts.
Margaret Haas	12/24/2018	1.00	Read and analyze cases re civil RICO.
Carl Hennies	12/24/2018	2.60	Prepare section of response brief on conducting or participating in the conduct of the enterprise.
Margaret Haas	12/25/2018	1.00	Read and analyze cases re civil RICO.
Andrew H. Schapiro	12/26/2018	4.00	Editing draft
David Lakin	12/26/2018	8.50	Editing MTD response, specifically predicate act section, and adding new case law in support
Margaret Haas	12/26/2018	1.40	Read and analyze cases re civil RICO; revise and edit draft opposition brief.
Carl Hennies	12/26/2018	1.50	Prepare section of response brief on Swart and Crowds on Demand conducting and participating in the affairs of the enterprise.
Andrew H. Schapiro	12/27/2018	4.00	Working on brief; emails and discussions re same
David Lakin	12/27/2018	4.50	Editing brief, cite checking brief, and making stylistic changes
Margaret Haas	12/27/2018	2.50	Read and analyze cases re civil RICO; revise and edit opposition brief.
Carl Hennies	12/27/2018	0.80	Review caselaw cited in response to motion to dismiss; correspond with team regarding various aspects of response, including potential motion to exceed page limits.
Andrew H. Schapiro	12/28/2018	5.50	Reviewing cases; revising and circulating draft
David Lakin	12/28/2018	1.50	Researching South Carolina state law extortion
Margaret Haas	12/28/2018	1.40	Draft and revise civil RICO statement re injury and impact on interstate commerce.
Stephen Swedlow	12/28/2018	0.80	Review opposition brief.
Carl Hennies	12/28/2018	0.20	Correspond with team regarding response to motion to dismiss and RICO case statement.
Margaret Haas	12/29/2018	2.30	Draft and revise RICO case statement.
Andrew H. Schapiro	12/30/2018	0.70	Reviewing MW's markup of brief
David Lakin	12/30/2018	3.60	Researching Norton Civil RICO cases and reviewing exemplar Civil RICO Statements; reviewing Opposition to Motion to Dismiss
Carl Hennies	12/30/2018	1.20	Prepare RICO case statement.
Andrew H. Schapiro	12/31/2018	4.50	Reviewing WL edits; working on brief
David Lakin	12/31/2018	7.80	Drafting and editing Civil RICO statement
Margaret Haas	12/31/2018	0.50	Revise and edit RICO cast statement.
Carl Hennies	12/31/2018	2.80	Prepare RICO case statement; review Wyche edits to response to motion to dismiss; correspond with team regarding same.
Andrew H. Schapiro	1/1/2019	4.50	Reviewing draft RICO statement and latest version of brief
David Lakin	1/1/2019	2.30	Editing and drafting Civil RICO statement
Stephen Swedlow	1/1/2019	1.10	Draft RICO case statement revisions.
Carl Hennies	1/1/2019	0.60	Prepare RICO case statement.
Andrew H. Schapiro	1/2/2019	8.00	Working on brief; working on RCS; team meeting; email

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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	1/2/2019	4.20	Editing Civil RICO Statement; editing brief; strategy meeting with team
Margaret Haas	1/2/2019	5.10	Revise and edit civil RICO case statement; read and analyze cases re civil RICO; confer with team re brief and RICO case statement.
Carl Hennies	1/2/2019	4.60	Review and revise response to motion to dismiss and RICO case statement; TC with team regarding same; legal research concerning domicile requirements for diversity jurisdiction.
Andrew H. Schapiro	1/3/2019	6.00	Working on RCS draft; back-forth re domicile; working on brief
David Lakin	1/3/2019	5.30	Editing and revising brief and Civil RICO statement
Margaret Haas	1/3/2019	2.70	Revise and edit opposition brief and RICO case statement.
Stephen Swedlow	1/3/2019	1.10	Opposition to motion to dismiss.
Katherine B. Fuller	1/3/2019	3.10	Review and revise opposition brief re: case citations.
Carl Hennies	1/3/2019	4.70	TC with A Bentz regarding domicile and diversity jurisdiction; TC with QE team regarding response brief and RICO case statement; review and revise response brief and RICO case statement; correspond with team regarding issues related to domicile.
Andrew H. Schapiro	1/4/2019	10.50	Editing, reviewing and finalizing RCS and brief; conf call with Wyche; conf call with D. Paul and M. Winn re open issues
David Lakin	1/4/2019	14.60	Editing brief and Civil RICO statement; preparing for filing brief and civil RICO statement; proofreading brief
Margaret Haas	1/4/2019	13.60	Revise and edit opposition brief; revise and edit RICO case statement; research law re tortious interference; finalize brief and case statement for filing.
Stephen Swedlow	1/4/2019	1.30	Revisions to MTD opposition and conference call with Marshall Winn to discuss revisions.
Katherine B. Fuller	1/4/2019	0.70	Review and revise opposition brief re: case citations.
Carl Hennies	1/4/2019	7.20	Review and revise response brief and RICO case statement; TC with team regarding response brief and RICO case statement; finalize response brief and RICO case statement for filing; conference with team regarding same.
Andrew H. Schapiro	1/9/2019	1.00	Call re status and developments; followup
Andrew H. Schapiro	1/10/2019	0.50	Review articles re Zeman's attempts to influence judges
Katherine B. Fuller	1/17/2019	0.10	Update files to reflect full docket.
Andrew H. Schapiro	1/21/2019	1.80	Review & analysis of Swart's reply; e-traffic re same
Margaret Haas	1/21/2019	0.30	Read and analyze defendants' brief in support of motion to dismiss.
Carl Hennies	1/22/2019	0.20	TC with DL regarding next steps.
Andrew H. Schapiro	1/23/2019	2.30	Emails from DP. Further review of Swart's reply and cases cited therein.
Carl Hennies	1/23/2019	0.20	Prepare email to team regarding expectations for next steps on motion to dismiss.
Andrew H. Schapiro	1/29/2019	1.00	Reading Krupa interview; reading articles re Zeman and courts
Andrew H. Schapiro	2/6/2019	0.50	Email from M. Winn re meeting; catching up on Czech news stories
Andrew H. Schapiro	2/13/2019	3.50	Initial work on argument prep, including reviewing briefs and key cases
Andrew H. Schapiro	2/15/2019	2.20	Conf call with M. Winn and D. Paul; followup call with M. Winn and W. Lightsey; followup
David Lakin	2/15/2019	1.80	Review D. Paul correspondence; review Amended Complaint; participate in conference call; summarize phone call and discuss with team.
Carl Hennies	2/15/2019	0.20	Review correspondence regarding efforts to extort
Andrew H. Schapiro	2/16/2019	0.70	Receipt and review of materials from D Paul



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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	2/16/2019	0.20	Correspond with M. Haas and C. Hennies re 2/15 phone call.
Margaret Haas	2/19/2019	0.40	Review and analyze recent correspondence in case.
Andrew H. Schapiro	2/20/2019	0.70	Call re status and developments
Katherine B. Fuller	2/20/2019	0.60	Review and process key website materials for discovery.
Margaret Haas	2/22/2019	0.40	Confer with A. Schapiro and D. Lakin re case strategy; review and analyze recent correspondence re case.
Andrew H. Schapiro	2/23/2019	1.50	Preliminary work on supplement; e-traffic re same
David Lakin	2/23/2019	2.20	Prepare RICO summary and circulate email to team.
Carl Hennies	2/23/2019	0.20	Review correspondence related to filing updated RICO case statement.
Andrew H. Schapiro	2/24/2019	1.00	Review and analysis of background materials
David Lakin	2/24/2019	2.30	Draft supplemental Civil RICO statement.
Margaret Haas	2/24/2019	1.20	Draft and revise supplemental RICO case statement.
Carl Hennies	2/24/2019	1.20	Prepare supplemental RICO case statement and correspond with MH and DL regarding same.
Andrew H. Schapiro	2/25/2019	2.50	Additional materials from D. Paul; working on supplementary RCS and motion re same
David Lakin	2/25/2019	3.90	Edit draft to supplemental Civil RICO statement; converse with M. Haas and C. Hennies re Civil RICO statement and motion to supplement.
Margaret Haas	2/25/2019	2.40	Draft and revise motion to file supplemental RICO case statement; confer with A. Schapiro and D. Lakin re case strategy.
Carl Hennies	2/25/2019	0.80	TC with DL regarding motion to supplement RICO case statement and oral argument; review and revise motion and supplement RICO case statement; conference with team regarding same.
Andrew H. Schapiro	2/26/2019	5.00	Editing and reviewing draft RCS supplement; preliminary prep for upcoming argument on MTD
David Lakin	2/26/2019	1.30	Review supplement Civil RICO statement; review motion for leave to supplement statement.
Katherine B. Fuller	2/26/2019	0.20	Review and revise motion for filing.
Andrew H. Schapiro	2/27/2019	5.50	Receipt, review and analysis of Swart's opposition to our motion to supplement RCS; preliminary work on reply; prep for upcoming oral argument on MTD
David Lakin	2/27/2019	3.10	Meet with Quinn Emanuel Bakala team; research cases involving amended/supplemental civil RICO case statement.
Margaret Haas	2/27/2019	3.80	Meet with A. Schapiro and Quinn team re preparations for motion to dismiss hearing; draft talking points for motion to dismiss; read and analyze cases cited in reply brief in support of defendants' motion to dismiss.
Carl Hennies	2/27/2019	5.10	TC with team regarding oral argument prep; review motion to dismiss briefing and related legal research; prepare notes for oral argument prep; review defendants' response to motion to supplement RICO case statement; review and revise reply in support of motion to supplement RICO case statement.
Andrew H. Schapiro	2/28/2019	6.50	Working on reply brief; prep for upcoming oral argument
David Lakin	2/28/2019	2.40	Review Swart Defendants' Reply brief re: predicate acts and insert comments to Swart Defendants' Reply brief.
Margaret Haas	2/28/2019	1.50	Research law re civil RICO; read and analyze key cases; draft talking points for motion to dismiss hearing argument.
Stephen Swedlow	2/28/2019	1.10	Correspondence and revisions re motion to supplement RICO case statement issues.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Carl Hennies	2/28/2019	4.20	Review and revise reply in support of motion to supplement RICO case statement and correspond with team regarding same; review motion to dismiss briefs and related legal research; annotate Crowds' reply brief with counterarguments.
Andrew H. Schapiro	3/1/2019	3.50	Reviewing materials and arguments in preparation for upcoming hearing.
David Lakin	3/1/2019	2.60	Annotate Swart Defendants' reply brief re: predicate act section and draft comments.
Margaret Haas	3/1/2019	0.40	Meet with A. Schapiro and D. Lakin re motion to dismiss hearing strategy.
Carl Hennies	3/1/2019	3.10	Review briefs for cases to be printed for hearing; correspond with MH and DL regarding preparation for hearing; review caselaw related to pattern requirement of RICO.
Andrew H. Schapiro	3/2/2019	4.00	Argument prep
Margaret Haas	3/2/2019	1.60	Draft and revise argument outline for motion to dismiss hearing.
Andrew H. Schapiro	3/3/2019	4.50	Working on oral-argument outline
David Lakin	3/3/2019	4.10	Prepare outline for Motion to Dismiss hearing; prepare highlights of Crowds on Demand's emails and protests; research case law re: Hobbs act extortion and intent.
Margaret Haas	3/3/2019	3.00	Draft outline for motion to dismiss argument.
Carl Hennies	3/3/2019	2.90	Review briefing and legal research; prepare outline for motion to dismiss hearing.
Andrew H. Schapiro	3/4/2019	7.50	Preparing for argument; editing draft PowerPoint; reviewing arguments re state-law causes of action; email exchanges with D. Paul re potential arguments on "injury"
David Lakin	3/4/2019	5.20	Review Swart Defendants' Reply brief re: state law claims and forum non conveniens; insert comments to Swart Defendants' Reply brief; prepare outline re: tortious interference.
Margaret Haas	3/4/2019	3.80	Draft and revise slide deck for use in motion to dismiss argument.
Carl Hennies	3/4/2019	10.10	Review legal research on defamation claim; travel to Charleston, SC for hearing while reviewing defamation caselaw; prepare annotated reply brief on defamation; prepare hearing outline on defamation and forum non-conveniens; correspond with team regarding matters related to hearing.
Andrew H. Schapiro	3/5/2019	8.00	Argument prep, including session with M. Winn and W. Lightsey; further revision of PowerPoint
David Lakin	3/5/2019	4.50	Review Andy's edits to Bakala Powerpoint; cite-check powerpoint for hearing; edit hearing outline.
Margaret Haas	3/5/2019	1.90	Draft and revise slides for motion to dismiss argument.
Carl Hennies	3/5/2019	7.40	Prepare for hearing; prepare talking points and potential hard questions for hearing; conference with AS, MW, and WL regarding motion to dismiss hearing; review and revise powerpoint for hearing; prepare cheat sheet distinguishing key cases.
Andrew H. Schapiro	3/6/2019	4.50	Prep for argument; court hearing; followup
David Lakin	3/6/2019	0.50	Debrief Motion to Dismiss hearing with C. Hennies and M. Haas.
Margaret Haas	3/6/2019	1.50	Revise and edit slide deck for use in motion to dismiss argument.
Carl Hennies	3/6/2019	5.20	Prepare for hearing; attend hearing; conference with AS, MW, WL, and BD following hearing; TC with MH and DL regarding hearing.
Andrew H. Schapiro	3/7/2019	0.50	Call to provide update re court argument and related matters
Margaret Haas	3/7/2019	0.30	Review recent correspondence re case.
Katherine B. Fuller	3/8/2019	0.30	Process key correspondence for review.
Andrew H. Schapiro	3/10/2019	0.20	Review draft of possible settlement letter from M. Winn
Carl Hennies	3/10/2019	4.20	Return travel from Charleston, SC while reviewing hearing notes and correspondence on defendants' representation.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	3/11/2019	1.00	Team meeting to discuss status and next steps; followup
David Lakin	3/11/2019	1.20	Meet with Quinn Emanuel Bakala team re: hearing; follow-up meeting with M. Haas and C. Hennies.
Margaret Haas	3/11/2019	1.40	Team meeting re motion to dismiss arguments, service of Pavol Krupa, jurisdictional discovery and other matters.
Carl Hennies	3/11/2019	1.80	TC with QE team regarding motion to dismiss hearing, service on Krupa, and jurisdictional discovery; legal research regarding jurisdictional discovery.
Andrew H. Schapiro	3/12/2019	2.00	Call with opposing counsel re jurisdictional discovery; pre-call with Wyche re same; review research from Carl H re same
Margaret Haas	3/12/2019	0.70	Read and analyze recent correspondence and filings re case.
Carl Hennies	3/12/2019	1.60	Legal research on jurisdictional discovery; prepare email to team summarizing results of research and other thoughts on jurisdictional discovery; review correspondence with Wyche regarding service on Krupa and jurisdictional discovery.
Andrew H. Schapiro	3/13/2019	0.70	Review draft consent motion from opposing counsel; review document re political attacks
Margaret Haas	3/13/2019	1.30	Review recent pleadings and correspondence in case; research law re forum non conveniens.
Katherine B. Fuller	3/13/2019	0.30	Review and process key correspondence.
Carl Hennies	3/13/2019	0.40	Review Crowds' proposed motion to set schedule for jurisdictional discovery and proposed motion to modify Krupa's reply deadline; review related correspondence.
Andrew H. Schapiro	3/15/2019	0.50	Catch up on "media monitoring" circulations
Margaret Haas	3/18/2019	2.60	Research law re forum non conveniens; read and analyze cases re same.
Margaret Haas	3/19/2019	1.20	Draft and revise memorandum re forum non conveniens; read and analyze cases re forum non conveniens.
Andrew H. Schapiro	3/20/2019	0.50	Email from D. Paul; assess potential uses for same
Margaret Haas	3/20/2019	2.50	Read and analyze cases re forum non conveniens; revise and edit memorandum re forum non conveniens.
Margaret Haas	3/21/2019	2.60	Research law re forum non conveniens; revise and edit memorandum re forum non conveniens.
Andrew H. Schapiro	3/22/2019	1.20	Preliminary review of jurisdictional discovery demands served by defendant
Margaret Haas	3/27/2019	3.20	Draft and revise stipulated protective order.
Andrew H. Schapiro	3/28/2019	0.50	Email traffic re draft protective order; input from Wyche; correspond with Wyche re jurisdictional discovery
Margaret Haas	3/28/2019	3.40	Draft and revise protective order; confer with A. Schapiro re outstanding discovery tasks.
Andrew H. Schapiro	3/29/2019	0.70	Review / edit draft protective order; e-traffic re same
Margaret Haas	3/29/2019	0.60	Revise and edit protective order; confer with Quinn and Wyche team re edits to protective order.
Andrew H. Schapiro	4/1/2019	0.70	Email traffic re draft protective order; followup
Margaret Haas	4/1/2019	0.50	Review interrogatories and draft responses and objections.
Andrew H. Schapiro	4/2/2019	0.80	Call re case developments
David Lakin	4/4/2019	1.50	Review defendants' discovery requests; confer with M. Haas; review forum non conveniens memo.
Andrew H. Schapiro	4/5/2019	0.20	Correspondence from D. Paul
David Lakin	4/5/2019	3.10	Review discovery responses; research domicile requirements in 4th Circuit; research forum non conveniens jurisdictional requirements.
Carl Hennies	4/6/2019	0.30	Review legal research on domicile and related issues; correspond with DL regarding same.

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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	4/9/2019	3.90	Draft forum non conveniens memorandum and research case law re: Civil RICO comparison in Czech Republic.
Andrew H. Schapiro	4/10/2019	1.20	Call with Wyche re jurisdictional discovery; followup re same
David Lakin	4/10/2019	4.70	Edit and finalize forum non conveniens memorandum; create jurisdictional discovery spreadsheet.
Margaret Haas	4/10/2019	3.30	Revise and finalize memorandum re forum non conveniens.
Andrew H. Schapiro	4/11/2019	1.30	Review memo on Forum Non in 4th Circuit from M. Haas; review defendants' proposed revisions to protective order
David Lakin	4/11/2019	5.30	Draft spreadsheet for responses to jurisdictional discovery interrogatories and requests for production; confer with M. Haas re: same.
Margaret Haas	4/11/2019	0.20	Revise and edit chart re discovery responses.
Carl Hennies	4/11/2019	0.40	Review memo on forum non conveniens.
Andrew H. Schapiro	4/12/2019	1.00	Review spreadsheets re potential discovery responses
David Lakin	4/12/2019	1.50	Review and edit spreadsheet with draft responses to jurisdictional discovery interrogatories and requests for production.
Margaret Haas	4/12/2019	1.40	Revise and edit chart re responses to defendants' discovery requests.
Andrew H. Schapiro	4/15/2019	0.70	Review MH markup / assessment re plaintiffs' proposed protective order
David Lakin	4/15/2019	0.50	Edit spreadsheet with responses to interrogatories and requests for production and draft email to Wyche.
Margaret Haas	4/15/2019	0.60	Confer with A. Schapiro re defendants' proposed edits to protective order.
Carl Hennies	4/15/2019	0.40	Review spreadsheet with thoughts on responses to RFPs and interrogatories.
Andrew H. Schapiro	4/16/2019	1.00	Further review of plaintiffs' markup; send comments re same
David Lakin	4/16/2019	2.20	Draft general objections to interrogatories.
Andrew H. Schapiro	4/18/2019	1.20	Work on letter to Wiley re protective order; email traffic re same
David Lakin	4/18/2019	4.20	Draft responses to interrogatories and requests for production; draft general objections; consult with M. Haas re: interrogatories and requests for production.
Margaret Haas	4/18/2019	2.20	Revise and edit written discovery responses; discuss discovery strategy with team.
Andrew H. Schapiro	4/19/2019	0.70	Correspondence from opposing counsel; conf call re potential response; revise email re same
Margaret Haas	4/19/2019	0.90	Revise and edit written discovery responses.
Andrew H. Schapiro	4/20/2019	1.00	Review spreadsheets with rough drafts of 'rog responses
David Lakin	4/20/2019	4.80	Draft responses to interrogatories and specific objections; review responses to interrogatories.
Andrew H. Schapiro	4/21/2019	0.60	Review additional drafts of discovery responses from MH
David Lakin	4/21/2019	5.50	Draft responses to requests for production and specific objections; review responses to requests for production.
Margaret Haas	4/21/2019	3.20	Draft and revise written discovery responses; confer with team re discovery plan.
Andrew H. Schapiro	4/22/2019	0.80	Review revised spreadsheet of discovery responses; review draft responses; email exchanges re related issues
David Lakin	4/22/2019	5.60	Edit, proofread, and finalize responses to interrogatories and responses to requests for production.
Margaret Haas	4/22/2019	5.40	Revise and edit response to Defendants' interrogatories; revise and edit response to Defendants' document requests.
Katherine B. Fuller	4/22/2019	0.30	Draft certificate of service.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	4/23/2019	1.00	Review letter from opposing counsel on issues relating to upcoming meet/confer. Confer with team re same
Margaret Haas	4/23/2019	0.60	Review and analyze recent correspondence from Wiley Rein.
Andrew H. Schapiro	4/24/2019	1.50	Telephonic meet/confer with opposing counsel; prep for and followup to same
David Lakin	4/24/2019	3.40	Research cases re: protecting personal information and using attorneys' eyes only designation beyond trade secrets/competitive business information.
Margaret Haas	4/24/2019	3.20	Telephone conference with Wyche and Quinn teams to prepare for meet and confer call; telephone conference with Wiley Rein to meet and confer re protective order; confer with A. Schapiro re case strategy.
David Lakin	4/25/2019	6.50	Continue research re: protecting personal information and using attorneys' eyes only designation beyond trade secrets/competitive business information; review and edit protective order.
David Lakin	4/26/2019	3.90	Research and distinguish Defendants' protective order cases.
David Lakin	4/29/2019	1.90	Review and edit protective order; circulate protective order to team.
Margaret Haas	4/29/2019	0.80	Draft and revise edits to protective order.
Carl Hennies	4/29/2019	0.50	Review final responses to RFPs and interrogatories.
Andrew H. Schapiro	4/30/2019	1.70	Review protective-order revisions; review Ostrava decision vs Arca
Andrew H. Schapiro	5/1/2019	1.50	Work on new confidentiality agreement and protective order, email traffic re same; transmit new draft to opposing counsel; review and assess deficiency letter received from opposing counsel.
David Lakin	5/1/2019	5.20	Revise and edit confidentiality agreement and proposed protective order; review letter from Defendants; research local rules for interrogatory signature requirements.
Margaret Haas	5/1/2019	0.40	Review and analyze letter from Defendants' counsel re discovery responses.
David Lakin	5/2/2019	0.50	Discuss Bakala jurisdictional discovery plan with team.
Margaret Haas	5/2/2019	2.00	Review and analyze Defendants letter re discovery requests; meet with A. Schapiro and D. Lakin re discovery strategy; draft letter responding to Defendants' letter re discovery requests.
Margaret Haas	5/3/2019	0.20	Confer with A. Schapiro re response to meet and confer letter.
Margaret Haas	5/4/2019	2.10	Draft letter response to Wiley Rein meet and confer letter re discovery responses.
Margaret Haas	5/5/2019	0.60	Revise and edit meet and confer letter.
Andrew H. Schapiro	5/6/2019	1.00	Review and revise draft of response letter to Obermeier; e-traffic re same.
David Lakin	5/6/2019	3.00	Research jurisdictional discovery cases for response letter to opposing counsel; review response letter.
David Lakin	5/7/2019	3.80	Review Arca v. Amtrust case docket; research additional jurisdictional discovery limitations.
Andrew H. Schapiro	5/8/2019	2.50	Moneta documents from D. Paul; edit and finalize response letter to Obermeier; confer and email with Haas, Lakin, and Wyche attorneys re same
David Lakin	5/8/2019	3.40	Research additional jurisdictional discovery limitations; review response letter; send response letter to opposing counsel.
Margaret Haas	5/8/2019	2.70	Revise and edit meet and confer letter; confer with A. Schapiro re case strategy; review and analyze Defendants' edits to draft protective order.
Katherine B. Fuller	5/8/2019	0.20	Review and summarize production specifications for discovery order.
Andrew H. Schapiro	5/9/2019	0.50	Review document sent by D. Paul; emails re same
Andrew H. Schapiro	5/13/2019	0.50	Confer and email with QE and Wyche teams re strategy for upcoming meet/confer.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Margaret Haas	5/13/2019	0.60	Confer with A. Schapiro, D. Lakin, and Wyche team re preparations for upcoming meet and confer and document production process.
Andrew H. Schapiro	5/14/2019	2.20	Meet/confer with opposing counsel re discovery and protective order; pre-call with Wyche and prep for same; followup.
David Lakin	5/14/2019	6.90	Prepare for meet and confer; conference call with Bakala team; attend meet and confer; follow up with C. Hennies; review local rules re motion to compel; review AmTrust litigation docket; prepare summary for team.
Margaret Haas	5/14/2019	5.10	Confer with Quinn and Wyche team in advance of meet and confer; participate in meet and confer re protective order and discovery requests; draft follow up points from meet and confer re protective order and confidentiality designations.
Carl Hennies	5/14/2019	0.20	TC with DL regarding motion to compel.
David Lakin	5/15/2019	2.20	Research jurisdictional waiver issue related to confidentiality stipulation.
Andrew H. Schapiro	5/16/2019	1.50	Work on, and confer with QE and Wyche team re, proposed edits to the protective order based on Tuesday's meet and confer, and related draft correspondence to Obermeier
Margaret Haas	5/16/2019	1.50	Confer with Quinn and Wyche teams re protective order; draft email to opposing counsel re protective order.
Andrew H. Schapiro	5/17/2019	0.50	Confer with Wyche team (via emails) re sealing and redaction issues
Andrew H. Schapiro	5/18/2019	0.50	Catch up on recent "media monitoring" circulations
Andrew H. Schapiro	5/20/2019	2.00	Review draft of "Bakala's Supplemental Responses to Swart Defendants' Interrogatories Regarding Plaintiffs' Residence"; provide comments re same; e-traffic re redactions; review and assess plaintiffs' Motion To Compel
David Lakin	5/20/2019	6.10	Edit and review supplemental responses to residence interrogatories; review Bakala document production; prepare supplemental responses for service to counsel.
Margaret Haas	5/20/2019	1.50	Review supplemental interrogatory responses; confer with Rachael Anna from Wyche re discovery strategy; confer with C. Hennies re discovery strategy.
Carl Hennies	5/20/2019	0.80	TC with MH regarding motion to compel; review Crowds' motion to compel.
Andrew H. Schapiro	5/21/2019	0.50	E-traffic and minor edits re cover letter for production and timing of production; review response from Obermeier re protective-order edits
David Lakin	5/21/2019	1.50	Review documents prior to production; cross check document production with requests for production responses; serve declaration on opposing counsel.
Margaret Haas	5/21/2019	1.10	Read and analyze Defendants' motion to compel.
Carl Hennies	5/21/2019	0.60	Prepare email to team with thoughts on Crowds' motion to compel; correspond with team regarding same.
Andrew H. Schapiro	5/22/2019	1.70	Further review and analysis of Motion To Compel; meet with QE team to map our response brief
David Lakin	5/22/2019	2.50	Review motion to compel response; meet with M. Haas and A. Schapiro re motion to compel response; confer with C. Hennies.
Margaret Haas	5/22/2019	1.30	Meet with A. Schapiro and D. Lakin re motion to compel opposition brief; review and analyze motion to compel brief.
Katherine B. Fuller	5/22/2019	0.30	Review and process production materials.



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Timekeeper Name	Work Date	Work Hrs	Narrative
Margaret Haas	5/23/2019	3.20	Draft brief in opposition to Defendants' motion to compel; confer with A. Schapiro re protective order.
David Lakin	5/24/2019	2.20	Research domicile standard and Forum Non Conveniens Standard re: jurisdictional discovery.
Margaret Haas	5/24/2019	5.70	Research law re discovery; read and analyze cases cited re same; draft brief in opposition to motion to compel.
Margaret Haas	5/25/2019	2.80	Draft and revise brief in opposition to motion to compel; read and analyze cases cited in motion to compel.
Margaret Haas	5/26/2019	3.00	Draft and revise brief in opposition to motion to compel; read and analyze cases cited in motion to compel; research law re discovery standards.
Margaret Haas	5/27/2019	2.50	Draft and revise brief in opposition to motion to compel; read and analyze key cases; research law re discovery standards.
David Lakin	5/28/2019	1.80	Research domestic injury requirement for civil RICO re: jurisdictional discovery.
Margaret Haas	5/28/2019	5.10	Draft and revise motion for protective order; research law re discovery; read and analyze cases re same; research law re protective orders; read and analyze cases re same; confer with A. Schapiro re case strategy.
Andrew H. Schapiro	5/29/2019	1.00	Call with M. Winn and confer with team re possible compromise re protective order; correspond with Obermeier re same
David Lakin	5/29/2019	4.50	Research Fed. R. Civ. P. 37; research D.S.C. motion to compel cases; research 4th circuit motion to compel cases.
Margaret Haas	5/29/2019	5.40	Revise and edit brief in opposition to motion to compel; read and analyze cases re scope of discovery; confer with A. Schapiro and M. Winn re protective order; draft revised protective order.
Andrew H. Schapiro	5/30/2019	3.00	Review and edit draft Brief in Opposition to Motion to Compel; email correspondence with Wyche and QE team re same
David Lakin	5/30/2019	3.80	Continue research of 4th circuit motion to compel cases; review motion to compel brief.
Margaret Haas	5/30/2019	5.60	Revise and edit brief in opposition to motion to compel; read and analyze cases cited in motion to compel; research law re discovery standards; review and analyze revised protective order.
Katherine B. Fuller	5/30/2019	2.70	Review and revise brief re: exhibit and case citations (2.4); review and finalize exhibits (.3).
David Lakin	5/31/2019	5.50	Review cases cited by Defendants; review rules concerning motion to compel response; review and edit response brief.
Margaret Haas	5/31/2019	3.50	Revise and edit brief in opposition to motion to compel; confer with Quinn and Wyche teams re brief; read and analyze key cases; research law re discovery.
Andrew H. Schapiro	6/1/2019	1.50	Edit opp to Motion To Compel
Stephen Swedlow	6/1/2019	0.70	Opposition to motion to compel; analyze/revise.
Andrew H. Schapiro	6/2/2019	1.50	Review revisions to brief and to draft of M. Winn Declaration (re undue burden); review list of open issues from M. Haas
David Lakin	6/2/2019	2.20	Review and cite check motion to compel response brief.
Margaret Haas	6/2/2019	2.60	Draft and revise declaration of Marshall Winn in support of opposition brief; revise and edit brief in opposition to motion to compel; telephone conference with Rachael Anna re document productions.
Andrew H. Schapiro	6/3/2019	2.00	Review latest draft; review W. Lightsey edits to same; email traffic re same; review revised M. Winn Declaration from R. Anna; oversee filing

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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	6/3/2019	6.60	Continue cite check of motion to compel response brief; prepare exhibits for filing; edit brief; prepare brief for filing.
Margaret Haas	6/3/2019	5.00	Revise and edit brief in opposition to motion to compel; confer with Quinn and Wyche team re finalization of brief; confer with Quinn and Wyche team re case strategy and document production; read and analyze key cases re discovery disputes.
Carl Hennies	6/3/2019	1.10	Review response to motion to compel and related correspondence.
Margaret Haas	6/4/2019	0.20	Confer with team re status of protective order.
Katherine B. Fuller	6/4/2019	0.30	Review and process key discovery correspondence.
Andrew H. Schapiro	6/5/2019	0.20	Internal email traffic re protective order and re outstanding tasks
David Lakin	6/5/2019	0.30	Review Krupa interview transcript.
Margaret Haas	6/5/2019	0.30	Confer with A. Schapiro and team re protective order.
Carl Hennies	6/5/2019	0.40	Legal research and prepare email to team on holding nonparties in violation of protective order.
Andrew H. Schapiro	6/6/2019	0.20	Send draft protective order to opposing counsel; email re same
Andrew H. Schapiro	6/10/2019	1.00	Review and correspond re defendants' reply brief
Katherine B. Fuller	6/10/2019	0.20	Review and process document production materials.
Carl Hennies	6/11/2019	0.50	Review Crowds' reply in support of motion to compel.
David Lakin	6/12/2019	0.50	Review correspondence from opposing counsel; finalize protective order.
Andrew H. Schapiro	6/14/2019	0.20	Review draft Motion For Stipulated Confidentiality Agreement, circulated by R. Anna
David Lakin	6/14/2019	0.80	Review protective order and draft motion.
Andrew H. Schapiro	6/17/2019	1.00	Review recent media-monitoring circulations; call from opposing counsel re counsel's withdrawal from case; e-traffic re same
Andrew H. Schapiro	6/18/2019	0.50	Review defense counsel's Motion To Withdraw; correspond re same
Andrew H. Schapiro	6/21/2019	0.20	Correspond with M. Winn re strategy for response to Motion To Withdraw
Andrew H. Schapiro	6/24/2019	0.40	Correspond re Judge Norton's decision to set hearing
Katherine B. Fuller	6/24/2019	0.30	Review and revise calendar re: upcoming hearings.
Carl Hennies	6/24/2019	0.20	Review correspondence regarding hearing on motion to withdraw.
Andrew H. Schapiro	6/26/2019	1.00	Review and edit draft of memorandum in response to Motion To Withdraw; e-traffic re same
Andrew H. Schapiro	6/27/2019	0.50	Call from D. Paul re developments; followup to same
Margaret Haas	6/27/2019	0.70	Read and analyze recent correspondence and filings re case.
Andrew H. Schapiro	7/1/2019	1.40	Call with D. Paul and others; pre-call; review documents sent by D. Paul
Andrew H. Schapiro	7/2/2019	1.00	Call re claim; followup
Andrew H. Schapiro	7/3/2019	0.20	Email from D. Paul following up on yesterday's call
Andrew H. Schapiro	7/4/2019	0.30	Email traffic
Andrew H. Schapiro	7/8/2019	0.50	Catch up on recent "media monitoring" circulations
Andrew H. Schapiro	7/10/2019	0.20	Email discussion with Wyche re upcoming conference
Carl Hennies	7/10/2019	0.20	TC with AS regarding upcoming hearing on motion to withdraw.
Andrew H. Schapiro	7/28/2019	0.40	Email correspondence re latest developments
Andrew H. Schapiro	7/29/2019	0.50	Correspond with M. Winn re conference and developments
Carl Hennies	7/29/2019	0.20	Correspond with team regarding upcoming hearing on motion to withdraw.
Andrew H. Schapiro	7/30/2019	0.50	Review recent "media monitoring" circulations

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	8/7/2019	1.00	Review materials in advance of upcoming court hearing.
David Lakin	8/7/2019	1.00	Prepare binder for A. Schapiro in advance of hearing.
Andrew H. Schapiro	8/8/2019	2.50	Court conference in Charleston. Confer with M. Winn and Bart Daniels re case and re strategy.
Carl Hennies	8/8/2019	0.20	Review correspondence regarding hearing on motion to withdraw; review proposed order on motion to withdraw.
Andrew H. Schapiro	8/9/2019	1.30	Confer with QE team re strategy and next steps in light of court's ruling. Edit proposed order. Email re same.
David Lakin	8/9/2019	1.00	Recap hearing and strategize with Bakala team.
Margaret Haas	8/9/2019	0.90	Participate in team meeting re updates from hearing and current case strategy.
Katherine B. Fuller	8/9/2019	0.40	Coordinate hearing transcript order (.2); update files to reflect full docket (.2).
Carl Hennies	8/9/2019	0.50	TC with team regarding hearing on motion to withdraw and other developments.
Katherine B. Fuller	8/12/2019	0.30	Coordinate transcript order (.2); update files to reflect full docket (.1).
Andrew H. Schapiro	8/14/2019	1.00	Call with Wyche re strategy and next steps; followup to same
David Lakin	8/14/2019	1.00	Conference call re strategy and discussion re memorandum with M. Haas.
Margaret Haas	8/14/2019	0.90	Telephone conference with Quinn and Wyche teams re case strategy; confer with D. Lakin and C. Hennies re potential amended complaint.
Carl Hennies	8/14/2019	0.80	TC with team regarding next steps; TC with MH and DL regarding memo on potential motion to amend pleadings.
Katherine B. Fuller	8/15/2019	0.20	Update files to reflect full docket.
Carl Hennies	8/19/2019	6.90	Legal research regarding amending pleadings under Rule 15(a) and related matters; review motion to dismiss briefing and motion to compel briefing; prepare memo on possibility of moving for leave to file a second amended complaint.
David Lakin	8/20/2019	1.10	Review memorandum and discuss with C. Hennies; review Amended Complaint.
Carl Hennies	8/20/2019	2.60	Prepare memo examining whether Court will allow amended complaint and issues on amending; conference with MH and DL regarding same.
Andrew H. Schapiro	8/21/2019	0.50	Review memo from Carl H re amending complaint.
David Lakin	8/21/2019	1.00	Review and edit memorandum re amending complaint.
Margaret Haas	8/21/2019	0.30	Review and edit memorandum re amended complaint.
Carl Hennies	8/21/2019	0.30	Review and revise memo on amending complaint; conference with MH and DL regarding same; circulate to team.
Andrew H. Schapiro	8/22/2019	0.50	Circulate memo re amending. Email traffic re same.
Stephen Swedlow	8/22/2019	1.00	Analyze amending complaint.
Andrew H. Schapiro	8/23/2019	0.50	Inquiry from D. Paul; followup re same.
Stephen Swedlow	8/23/2019	0.50	Analyze correspondence.
David Lakin	8/27/2019	0.50	Review deadline for new counsel; review hearing transcript.
Katherine B. Fuller	8/27/2019	0.20	Review and revise calendar re: upcoming deadlines.
Andrew H. Schapiro	8/28/2019	0.70	Call with new counsel for Swart / Crowds; followup emails with QE and Wyche.
Andrew H. Schapiro	9/3/2019	0.70	Review recent "media monitoring" circulations
Andrew H. Schapiro	9/4/2019	0.20	Email traffic re further inquiry from Swart's counsel
Andrew H. Schapiro	9/5/2019	0.50	Call with Swart's counsel; email traffic re same

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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	9/5/2019	0.70	Conduct conference call with team and discuss strategy.
Margaret Haas	9/5/2019	0.50	Telephone conference with Wyche team and Quinn team re case strategy.
Carl Hennies	9/5/2019	0.50	TC with team regarding next steps with new counsel for Crowds and Swart.
Katherine B. Fuller	9/9/2019	0.10	Update files to reflect full docket.
Andrew H. Schapiro	9/10/2019	0.50	Call with Swart's counsel re possible settlement terms
Carl Hennies	9/11/2019	0.20	Review emails regarding communications with Crowds' new counsel.
Andrew H. Schapiro	9/16/2019	0.50	Call with Swart's counsel
Andrew H. Schapiro	9/19/2019	0.50	Call with Wyche re settlement strategy
David Lakin	9/19/2019	0.80	Conduct conference call with team.
Carl Hennies	9/19/2019	0.80	TC with team regarding next steps with Crowds' new counsel and other matters.
Andrew H. Schapiro	9/20/2019	0.50	Call with Swart's counsel
Carl Hennies	9/20/2019	0.70	Review recent Norton order on defamation and related correspondence.
Andrew H. Schapiro	9/24/2019	0.70	Call with M. Winn and W. Lightsey re strategy and developments in light of court's order scheduling conference; followup
Carl Hennies	9/24/2019	0.50	TC with AS regarding hearing, state of motions, and next steps.
Katherine B. Fuller	9/25/2019	0.30	Update files to reflect full docket.
Andrew H. Schapiro	9/26/2019	0.80	Catch up on media monitoring circulations
Andrew H. Schapiro	9/27/2019	1.00	Confer with M. Winn re Crowds situation; call with Swart's counsel
Andrew H. Schapiro	9/30/2019	0.50	Email from M. Winn; followup call with M. Winn
Andrew H. Schapiro	10/1/2019	0.50	Email exchanges with M. Winn and W. Lightsey re judge's decision to reschedule conference
Andrew H. Schapiro	10/3/2019	1.00	QE meeting re Krupa and settlement strategy; review summary of settlement points circulated by C. Hennies
David Lakin	10/3/2019	0.70	Meet and strategize with Bakala team; review discussion points.
Margaret Haas	10/3/2019	1.00	Team meeting re case strategy; draft bullet points re next steps in negotiation with Adam Swart and Crowds on Demand.
Stephen Swedlow	10/3/2019	0.70	Team meeting.
Carl Hennies	10/3/2019	0.70	TC with team regarding recent developments and strategy going forward; review and revise bullet points for Crowds/Swart settlement.
Margaret Haas	10/8/2019	0.30	Confer with Wyche team and Quinn team re case strategy.
Andrew H. Schapiro	10/9/2019	0.50	Email correspondence with Wyche re settlement
Carl Hennies	10/9/2019	0.30	Conference with team regarding potential settlement and next steps.
Andrew H. Schapiro	10/10/2019	0.80	Phone call with opposing counsel re settlement terms; correspond with opposing counsel re same
David Lakin	10/10/2019	0.20	Review correspondence re: strategy in Bakala.
Andrew H. Schapiro	10/11/2019	1.00	Review (unusually heavy) recent media-monitoring circulations
Andrew H. Schapiro	10/16/2019	0.70	Review counter-proposal from opposing counsel; email traffic re same
Carl Hennies	10/16/2019	0.20	Review Crowds and Swart's proposal for settlement; correspond with team regarding same.
Andrew H. Schapiro	10/17/2019	0.40	Correspond with opposing counsel re settlement
Andrew H. Schapiro	10/18/2019	1.00	Review W. Lightsey's draft settlement agreement and draft covenant not to execute
Andrew H. Schapiro	10/20/2019	0.40	Prepare and send draft of settlement agreement to R. Alcantra

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	10/23/2019	2.00	Confer with opposing counsel re upcoming conference; confer with M. Winn re conference, settlement status, and strategy
Andrew H. Schapiro	10/24/2019	3.00	Court conference; confer with M. Winn re same; follow up with C. Hennies re draft of proposed order; email traffic re same
Carl Hennies	10/24/2019	0.70	TC with AS regarding hearing; prepare proposed order
Andrew H. Schapiro	10/25/2019	0.70	Review Swart's proposed revisions to agreement
David Lakin	10/27/2019	0.50	Review settlement agreement; run redline.
Andrew H. Schapiro	10/28/2019	0.70	Review recent media-monitoring circulations
Andrew H. Schapiro	11/5/2019	0.60	Review settlement-agreement status; email traffic re same
Andrew H. Schapiro	11/6/2019	1.00	Confer with D. Paul re recent developments; email traffic with M. Winn and W. Lightsey
Andrew H. Schapiro	11/11/2019	2.20	Receive and review Krupa's "answer"; call with M. Winn re same; email traffic re settlement draft edits; send comments to opposing counsel
David Lakin	11/11/2019	1.10	Review Krupa's answer to the complaint; review attachments filed with answer to complaint.
Andrew H. Schapiro	11/13/2019	0.30	Email correspondence from D. Paul re Krupa's "answer"
Margaret Haas	11/13/2019	0.60	Read and analyze Pavol Krupa's answer to the complaint.
Andrew H. Schapiro	11/19/2019	0.40	Additional material from D. Paul in response to Krupa's submission
Andrew H. Schapiro	11/25/2019	0.70	Receive and review opposing counsel's latest markup of draft settlement agreement; email correspondence re same.
Andrew H. Schapiro	11/26/2019	0.60	Edit draft motion to strike. Email correspondence re wording of update.
Andrew H. Schapiro	11/27/2019	0.50	Additional minor edits to motion to strike. Email correspondence re settlement agreement details.
Andrew H. Schapiro	12/2/2019	0.50	Correspondence from D. Paul re meeting. Email traffic.
David Lakin	12/2/2019	1.00	Review correspondence from D. Paul; research Secure Public Relations.
Andrew H. Schapiro	12/4/2019	0.80	Send latest edits to Swart's counsel. Review court order directing Krupa to respond to interrogatories.
Andrew H. Schapiro	12/9/2019	0.50	Inquiry from Norton's clerk re status of motions. Email exchanges with team and with opposing counsel re same.
Andrew H. Schapiro	12/10/2019	1.20	Review Krupa's "Completion of the Reply". Email traffic re same.
Andrew H. Schapiro	12/12/2019	0.70	Comments from D. Paul re Krupa's latest filings; review recent media-monitoring circulations.
Andrew H. Schapiro	12/13/2019	1.00	New revised draft of settlement agreement from opposing counsel. Email from D. Paul
Stephen Swedlow	12/13/2019	0.80	Analyze draft settlement agreement.
Katherine B. Fuller	12/13/2019	0.20	Update files to reflect full docket.
Andrew H. Schapiro	12/16/2019	1.00	Further back-and-forth re content of Statement, and edits to same.
David Lakin	12/16/2019	0.50	Review Swart settlement changes; review Amended Complaint for additional entities.
Andrew H. Schapiro	12/17/2019	1.20	QE-Wyche email correspondence re Statement language. Review and revise Statement. Send same to opposing counsel.
Andrew H. Schapiro	12/18/2019	1.50	Phone conference with opposing counsel re settlement agreement and draft statement. Email correspondence with QE and Wyche teams re same.
Andrew H. Schapiro	12/19/2019	1.00	Correspond with opposing counsel re drafts of Covenant Not To Execute and re Swart statement. Internal emails re same.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	12/20/2019	1.50	Confer with opposing counsel re terms. Revise section of agreement regarding dismissal of motion to dismiss. Email traffic with Wyche re same. Krupa files answers to court's interrogatories.
Carl Hennies	12/20/2019	1.40	Legal research regarding withdrawing motions with and without prejudice, and changing designation from without prejudice to with prejudice; conference with AS regarding same.
Andrew H. Schapiro	12/21/2019	1.00	Further work on Statement. QE-Wyche emails re same. Send revised draft to opposing counsel.
Andrew H. Schapiro	12/23/2019	2.30	New draft Statement from opposing counsel. Email traffic re same. Revisions. Confer with team. Review recent media-monitoring circulations.
Stephen Swedlow	1/1/2020	0.60	Motion to strike amended answer.
Andrew H. Schapiro	1/2/2020	1.40	Review and edit draft Motion to Strike. Review revised settlement agreement draft.
Andrew H. Schapiro	1/3/2020	0.50	Email traffic with opposing counsel re Ex C; review same.
Andrew H. Schapiro	1/5/2020	0.70	Review comments from David Paul. Correspondence from David Paul re website URL in settlement. Correspond with opposing counsel re language in draft settlement.
Andrew H. Schapiro	1/6/2020	1.50	Call with M. Winn re logistics of executing agreement. Extensive correspondence re same. Email traffic re joint status report. Review new draft of agreement from opposing counsel. Email traffic re same.
Andrew H. Schapiro	1/7/2020	1.00	Email re details and loose ends re settlement. QE team meeting to provide update / status.
David Lakin	1/7/2020	2.50	Team meeting; review settlement agreement; circulate upcoming deadlines to team.
Margaret Haas	1/7/2020	0.90	Review and analyze final settlement agreement; attend Quinn team meeting re case strategy with A. Schapiro, S. Swedlow, D. Lakin, and C. Hennies.
Carl Hennies	1/7/2020	0.60	Review settlement agreement and related correspondence; TC with team regarding settlement and next steps.
Andrew H. Schapiro	1/8/2020	0.60	Review opposing counsel's proposal for terms of withdrawal of MTD. Correspond with Wyche re same.
David Lakin	1/8/2020	0.50	Review settlement agreement and circulate email re: jurisdictional discovery.
Katherine B. Fuller	1/8/2020	0.30	Review and revise calendar re: settlement agreement deadlines.
Andrew H. Schapiro	1/9/2020	0.80	Contact opposing counsel re Exhibit C. Review Notice from Court. Correspond with Wyche re same.
David Lakin	1/9/2020	1.70	Review Defendant Krupa's answer; prepare binder for A. Schapiro.
Carl Hennies	1/9/2020	0.30	Review order from court and related correspondence.
Andrew H. Schapiro	1/10/2020	0.50	Correspond with Wyche and with opposing counsel re discovery invoice.
Andrew H. Schapiro	1/13/2020	0.40	Review draft release re Swart apology; email.
Katherine B. Fuller	1/13/2020	0.20	Update files to reflect full docket.
Andrew H. Schapiro	1/14/2020	0.50	Correspond with Wyche re apology-press-release; review drafts of same.
Andrew H. Schapiro	1/17/2020	0.50	Email traffic re Seznam Zpravy article on Swart apology and Krupa response. Correspond with M. Winn and with opposing counsel re unredacted Ex. C.
Andrew H. Schapiro	1/21/2020	0.50	Further correspondence re Exhibit C. Email traffic re inquiry from journalist.
Andrew H. Schapiro	1/22/2020	0.70	Review and analyze unredacted Ex. C; email traffic re same. Correspond with M. Winn and C. McShane re proposed response to journalist.
David Lakin	1/22/2020	1.00	Review Ex. C and correspondence re same.
Andrew H. Schapiro	1/24/2020	0.40	Catch up on recent "media monitoring" circulations.



## APPENDIX B

Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	1/27/2020	0.80	Review article re "Stop The Thieves". Review video clip of Krupa at Zeman event. Email traffic.
Andrew H. Schapiro	1/28/2020	0.50	Review Internet story about Swart and Krupa. Email correspondence with Wyche and others re same.
David Lakin	1/29/2020	1.00	Review docket and settlement agreement; circulate email re upcoming deadlines.
Andrew H. Schapiro	1/30/2020	1.20	Review Krupa's new "response" to Motion To Strike. Email traffic re same and re right to reply.
David Lakin	1/30/2020	0.30	Review case deadlines and correspond with team re same.
Carl Hennies	1/30/2020	0.30	Review Krupa's response to motion to strike; correspond with team regarding same.
Andrew H. Schapiro	2/3/2020	0.40	Review translated article re ZB. Email traffic.
Andrew H. Schapiro	2/5/2020	2.00	Call to provide/receive update. Email traffic re opposing counsel's supposed confidentiality obligations regarding documents. Edit draft brief in Reply to Krupa's "opposition" to motion to strike.
Katherine B. Fuller	2/6/2020	0.20	Update files to reflect full docket (.2).
Carl Hennies	2/6/2020	0.10	Review reply ISO motion to strike.
Andrew H. Schapiro	2/10/2020	0.50	Catch up on recent "media monitoring" circulations.
Andrew H. Schapiro	2/11/2020	0.60	Review new article from "Institutional Investor" regarding Krupa (and quoting M. Winn). Email traffic re same.
Andrew H. Schapiro	2/15/2020	0.30	Correspond with Lakin re Swart production, esp re size and re logistics of review.
David Lakin	2/15/2020	1.00	Confer with team and W. Kim re Swart production.
Carl Hennies	2/15/2020	0.30	Review correspondence related to document production by Crowds.
David Lakin	2/17/2020	4.50	Review Swart documents; summarize documents.
Andrew H. Schapiro	2/18/2020	1.20	Review flagged documents from Swart production. Call with Wyche team.
David Lakin	2/18/2020	2.30	Review Swart documents; summarize documents; conference call with team.
Andrew H. Schapiro	2/19/2020	1.00	Review newly filed "sur-reply" from Krupa. Email traffic re same.
David Lakin	2/19/2020	1.00	Review Swart documents and correspond with R. Anna re: deficiencies.
Carl Hennies	2/19/2020	0.40	Review Krupa's sur-reply and correspond with team regarding same.
Andrew H. Schapiro	2/20/2020	0.60	Review Motion To Strike circulated by R. Anna; correspond re same
Andrew H. Schapiro	2/21/2020	0.50	Review court's partial grant of motion. Email correspondence re same.
David Lakin	2/21/2020	0.80	Review court order; discuss with A. Schapiro; circulate email to team.
Carl Hennies	2/21/2020	0.40	Review motion to strike sur-reply; review court's order on motion to strike Krupa's pleadings and related correspondence.
Andrew H. Schapiro	2/23/2020	0.30	Review documents flagged by Lakin.
David Lakin	2/23/2020	3.70	Review Swart documents and correspond with team re same.
Andrew H. Schapiro	2/24/2020	0.50	Review recent media monitoring circulations.
David Lakin	2/24/2020	1.00	Review Swart documents.
Margaret Haas	2/24/2020	1.90	Confer with A. Schapiro re response to Krupa's personal jurisdiction arguments; review and analyze prior briefs and analyses re Krupa's ties to United States; confer with C. Hennies and D. Lakin re drafting response to Krupa's personal jurisdiction arguments.
Andrew H. Schapiro	2/25/2020	1.70	Review and comment on outline of law/facts for jurisdictional brief. Review certain documents flagged by Lakin. Email traffic re same. Review translation of Czech article noting Swart's apology.
David Lakin	2/25/2020	3.20	Review Swart documents; confer with R. Anna; confer with Quinn Emanuel eDiscovery specialist re metadata deficiency.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Margaret Haas	2/25/2020	1.70	Draft and revise bullet points for factual arguments re personal jurisdiction over Pavol Krupa; confer with C. Hennies re personal jurisdiction legal research.
Katherine B. Fuller	2/25/2020	0.30	Process key documents for review (.3).
Carl Hennies	2/25/2020	4.80	Legal research regarding personal jurisdiction standard, law, and whether RICO provides for "national contacts" jurisdiction; prepare summary and send to team.
Andrew H. Schapiro	2/26/2020	0.50	Additional document from Lakin. Email traffic re same and re personal jurisdiction brief.
David Lakin	2/26/2020	5.40	Review Swart documents; tag key documents; confer with R. Anna re same.
Carl Hennies	2/26/2020	3.20	Legal research regarding personal jurisdiction and national contacts test under RICO and FRCP 4; prepare summary email to team regarding same.
Andrew H. Schapiro	2/27/2020	1.00	Edit and comment on draft deficiency letter. Email traffic re same.
Margaret Haas	2/27/2020	0.20	Confer with C. Hennies re draft personal jurisdiction brief; confer with Quinn team re case strategy re personal jurisdiction and key documents from Swart review.
Carl Hennies	2/27/2020	1.40	TC with MH regarding response to motion to dismiss for lack of personal jurisdiction; prepare response to motion to dismiss for lack of personal jurisdiction.
Carl Hennies	2/28/2020	4.20	Prepare response to motion to dismiss for lack of personal jurisdiction; related legal research.
Margaret Haas	2/29/2020	0.50	Review and edit brief opposing Krupa's motion to dismiss for lack of personal jurisdiction.
Carl Hennies	2/29/2020	5.80	Prepare response to Krupa's personal jurisdiction challenge; related legal research.
David Lakin	3/1/2020	1.80	Review Swart documents.
Andrew H. Schapiro	3/2/2020	1.50	Review and edit draft response re personal jurisdiction.
Carl Hennies	3/2/2020	0.20	Review and revise response to Krupa's personal jurisdiction challenge.
Andrew H. Schapiro	3/3/2020	2.00	Edit new draft of p.j. submission. Correspond re same. Review Krupa affidavits from DE and PA cases for possible use in submission. Circulate to Wyche.
David Lakin	3/3/2020	1.80	Review Swart documents; review Krupa affidavits submitted in Delaware Chancery Court.
Carl Hennies	3/3/2020	1.80	Review and revise response to Krupa's jurisdictional challenge; conference with team regarding same.
Andrew H. Schapiro	3/4/2020	1.50	Review Wyche edits to PJ submission. Further revisions. Correspond re same.
Margaret Haas	3/4/2020	0.30	Confer with Quinn team re edits to brief and key cases; revise and edit draft brief.
Katherine B. Fuller	3/4/2020	1.70	Review and revise response re personal jurisdiction motion to dismiss (1.7).
Carl Hennies	3/4/2020	1.30	Review comments on response to Krupa's personal jurisdiction challenge; review and revise same; correspond with team regarding same.
Andrew H. Schapiro	3/5/2020	1.50	Finalize PJ submission. Review "Defendant's Reply to Plaintiffs' Proposal" from Krupa. Correspond re same.
David Lakin	3/5/2020	1.50	Review and edit response to motion to Krupa's personal jurisdiction motion to dismiss.
Carl Hennies	3/5/2020	0.10	Review new Krupa filing.
Andrew H. Schapiro	3/6/2020	1.50	Call from opposing counsel re production deficiencies. Email correspondence re same. Review letter from opposing counsel re deficiencies and remediation. Correspond with Wyche re same.
David Lakin	3/6/2020	7.50	Review and edit response to motion to Krupa's personal jurisdiction motion to dismiss; compile exhibits; review Swart documents; review Swart correspondence and draft email re same.
Carl Hennies	3/6/2020	0.20	Correspond with team regarding finalizing filing of response to personal jurisdiction challenge.
David Lakin	3/9/2020	1.00	Annotate key Swart documents for A. Schapiro.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Katherine B. Fuller	3/10/2020	0.50	Process key documents for review (.5).
David Lakin	3/11/2020	4.30	Annotate key Swart documents for A. Schapiro and prepare binder re same.
Andrew H. Schapiro	3/12/2020	1.00	Review Swart texts sent by D. Lakin
David Lakin	3/12/2020	1.80	Review Swart documents; send email to team re Swart documents.
Katherine B. Fuller	3/12/2020	0.40	Process produced key materials for review (.3); process key correspondence (.1).
Andrew H. Schapiro	3/13/2020	1.00	New Swart production; email traffic re same. Catch up on media-monitoring circulations.
Carl Hennies	3/16/2020	0.10	Review Krupa's request for extension of time.
Carl Hennies	3/17/2020	0.10	Review court's order on Krupa's motion to extend deadline.
Andrew H. Schapiro	3/18/2020	0.50	Email traffic re Swart production. Confer with R. Anna re same.
David Lakin	3/18/2020	2.20	Review Swart documents; circulate summary.
David Lakin	3/19/2020	1.00	Review Swart documents, review Swart spreadsheets.
Katherine B. Fuller	3/19/2020	0.30	Process key documents for review.
Andrew H. Schapiro	3/20/2020	1.00	Review P. Krupa's "Response to Plaintiff's Proposed of March 6, 2020"
David Lakin	3/20/2020	2.10	Review Swart documents; summarize documents.
David Lakin	3/21/2020	6.20	Review Swart documents; draft summary of documents.
Carl Hennies	3/21/2020	0.30	Review Krupa's reply to personal jurisdiction motion.
Andrew H. Schapiro	3/22/2020	1.20	Review index and summary of Swart texts sent by D. Lakin
David Lakin	3/22/2020	4.50	Review Swart documents; draft summary of documents.
Carl Hennies	3/22/2020	0.20	Review highlights of documents produced by Swart; review related correspondence.
Andrew H. Schapiro	3/23/2020	0.40	Additional email traffic re Swart texts.
David Lakin	3/23/2020	1.80	Review Swart document production and draft email to team re discovery deficiencies.
Carl Hennies	3/23/2020	0.20	Review correspondence related to documents produced by Crowds on Demand and related matters.
Andrew H. Schapiro	3/27/2020	0.50	Catch up on recent media-monitoring circulations.
David Lakin	3/27/2020	0.60	Review correspondence from R. Anna and review Swart privilege log.
Andrew H. Schapiro	3/31/2020	0.80	Review / analyze Magistrate Judge's R&R re personal jurisdiction. Correspond re same.
Margaret Haas	3/31/2020	0.20	Review and analyze order denying Krupa's motion to dismiss for lack of jurisdiction.
Katherine B. Fuller	3/31/2020	0.40	Update files to reflect full docket.
Carl Hennies	3/31/2020	0.30	Review R&R on personal jurisdiction and related correspondence.
Andrew H. Schapiro	4/1/2020	0.80	Call re report & recommendation and re next steps. Followup.
David Lakin	4/1/2020	0.50	Conference call with Bakala team.
Margaret Haas	4/1/2020	0.50	Telephone conference with Quinn team and Wyche team re personal jurisdiction order and next steps.
Carl Hennies	4/1/2020	0.60	TC with team regarding report and recommendation, settlement milestones, and related matters.
Andrew H. Schapiro	4/2/2020	0.70	Confer with opposing counsel re discovery issues and possible extension of schedule. Review correspondence from R. Anna.
Carl Hennies	4/2/2020	0.10	Review correspondence related to Crowds document production and settlement timeline.
Andrew H. Schapiro	4/11/2020	0.50	Review recent media-monitoring circulations.
Carl Hennies	4/17/2020	0.10	Review docket for Krupa's deadline to object to R&R and correspond with team regarding same.
Andrew H. Schapiro	4/24/2020	0.50	Catch up on media-monitoring circulations.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	4/26/2020	0.30	Email from vendor re Volume 5 and a re-production of documents with removed/edited redactions. Internal email re same.
David Lakin	4/27/2020	0.60	Upload Swart documents; review court deadlines; send email re same.
David Lakin	4/28/2020	0.40	Review Swart documents.
Andrew H. Schapiro	5/1/2020	0.50	Correspond re Alcantra letter
Carl Hennies	5/1/2020	0.10	Review correspondence from opposing counsel regarding document production.
Andrew H. Schapiro	5/5/2020	0.30	Correspond with Lakin re latest production and related logistics.
David Lakin	5/6/2020	3.00	Review Swart documents and summarize findings.
Katherine B. Fuller	5/6/2020	0.20	Process correspondence for review (.2).
Andrew H. Schapiro	5/7/2020	1.40	Zoom call with Wyche re next steps. Email traffic re same. Followup.
David Lakin	5/7/2020	5.30	Conference call with team; review and summarize Swart documents.
Margaret Haas	5/7/2020	0.60	Telephone conference with Quinn and Wyche teams re next steps and case strategy (0.6).
Carl Hennies	5/7/2020	0.60	TC with team regarding next steps.
Andrew H. Schapiro	5/8/2020	0.50	Court affirms R&R denying Krupa's challenge to personal jurisdiction. Correspond re same.
David Lakin	5/8/2020	2.00	Review Swart documents and summarize documents.
David Lakin	5/9/2020	4.10	Review and summarize Swart documents.
David Lakin	5/10/2020	7.00	Review Swart documents and summarize.
David Lakin	5/11/2020	2.20	Review Swart documents and summarize documents.
Andrew H. Schapiro	5/12/2020	0.50	Motion to strike granted; Krupa given 21 days. Email traffic re same.
David Lakin	5/12/2020	2.20	Review and summarize Swart documents.
David Lakin	5/13/2020	4.40	Review and summarize Swart documents.
David Lakin	5/14/2020	7.30	Review and summarize Swart documents; draft email re Swart document and privilege issues.
Andrew H. Schapiro	5/15/2020	0.80	Review D. Lakin's summary of volumes 5 and 6 of Swart production.
David Lakin	5/15/2020	4.80	Complete review of Swart Volumes 5 and 6 Documents; categorize documents; send email re Swart volumes and 6 documents.
Carl Hennies	5/15/2020	0.20	Review summary of Swart production.
Andrew H. Schapiro	5/18/2020	0.70	Email re various topics. Review recent media-monitoring circulations.
David Lakin	5/18/2020	1.20	Review Swart documents and pull documents to circulate to team.
Andrew H. Schapiro	5/19/2020	1.80	Confer with team re topics for Swart affidavit. Correspond re inquiry from clerk re pending Motion to Amend RICO Case Statement. Emails from Wyche re latest production. Email from R. Anna re conversation with Alcantra.
David Lakin	5/19/2020	1.50	Address document deficiencies in Swart's production; draft email re next steps in case.
Carl Hennies	5/19/2020	1.50	Review email for law clerk concerning withdrawing motion to amend RICO case statement; conference with team regarding same; review pleadings and prepare outline of topics for Swart deposition/affidavit.
Andrew H. Schapiro	5/20/2020	2.00	Revise and circulate bullet points for affidavit. Correspond with Wyche re input for same.
David Lakin	5/20/2020	2.50	Review Swart documents; edit affidavit re Swart.
Katherine B. Fuller	5/20/2020	0.30	Update files to reflect full docket.
Carl Hennies	5/20/2020	0.70	Prepare outline of topics for Swart affidavit/deposition; correspond with team regarding same.
Andrew H. Schapiro	5/21/2020	0.50	Email traffic re Swart documents. Review video

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Timekeeper Name	Work Date	Work Hrs	Narrative
David Lakin	5/21/2020	2.50	Review Swart documents; circulate email re same; review Krupa payment records; confer with W. Kim re document deficiencies.
Andrew H. Schapiro	5/22/2020	0.50	Call with Alcantra. Followup.
David Lakin	5/22/2020	0.80	Review Swart documents and address discovery issues.
David Lakin	5/26/2020	1.50	Review volume 8 and 9 of Swart documents.
Andrew H. Schapiro	5/27/2020	1.40	Review proposed status report and motion for extension from Alcantra. Correspond with Alcantra. Lakin circulates highlights from new production. Review same.
David Lakin	5/27/2020	2.40	Finish review of Swart volumes 8 & 9; draft summary of documents; pull documents for review.
Carl Hennies	5/27/2020	0.20	Review highlights of latest Swart production; review motion to extend deadlines.
Andrew H. Schapiro	5/29/2020	0.50	Review recent media-monitoring circulations.
Andrew H. Schapiro	6/2/2020	0.20	Email correspondence re timing for motion for default.
Carl Hennies	6/2/2020	0.20	Conference with team regarding Krupa's answer deadline and default judgment proceedings.
Andrew H. Schapiro	6/4/2020	0.50	Review draft of request for entry default judgment circulated by M. Winn. Email correspondence re same and re timing.
Carl Hennies	6/4/2020	0.10	Review correspondence related to motion for default for Krupa.
Andrew H. Schapiro	6/8/2020	0.20	Email traffic re grant of default request.
Carl Hennies	6/8/2020	0.20	Review order extending Krupa's deadline for responding to motion to amend RICO case statement; review correspondence regarding clerk's entry of default.
Andrew H. Schapiro	6/9/2020	2.50	Work on draft Swart declaration. Review documents relating to same.
Andrew H. Schapiro	6/10/2020	3.50	Further work on Swart declaration and supporting documents. Circulate draft internally.
Andrew H. Schapiro	6/11/2020	1.00	Correspond with D. Lakin re Swart declaration details. Review revisions.
David Lakin	6/11/2020	1.20	Edit Bakala declaration.
Carl Hennies	6/11/2020	0.40	Review draft Swart affidavit and related correspondence.
Andrew H. Schapiro	6/12/2020	1.00	Review comments on Swart declaration received from W. Lightsey and M. Winn. Review recent media-monitoring circulations.
Andrew H. Schapiro	6/15/2020	1.50	Receive and review comments from D. Paul via M. Winn. Implement changes to affidavit. Email correspondence re confidentiality designations.
David Lakin	6/15/2020	0.40	Review declaration and court deadlines.
Carl Hennies	6/15/2020	0.10	Review DP comments to Swart declaration.
Andrew H. Schapiro	6/16/2020	0.50	Review new comments from D. Paul and M. Winn re open questions.
David Lakin	6/16/2020	0.20	Review documents related to paragraph 19 of the Swart declaration.
Andrew H. Schapiro	6/18/2020	1.50	Edit and circulate new Swart affidavit. Correspond re same.
David Lakin	6/18/2020	0.50	Review Swart declaration.
Andrew H. Schapiro	6/19/2020	0.50	Review and implement input from D. Paul.
David Lakin	6/19/2020	1.30	Review Swart declaration and compare to Swart production for accuracy.
Andrew H. Schapiro	6/21/2020	1.00	Revise and send near-final draft to client and team.
Andrew H. Schapiro	6/22/2020	1.30	Finalize remaining changes to Swart aff. Email exchanges with D. Paul and Wyche. Send to Raul Alcantar. Email correspondence by new order from Mag Judge extending time to respond to motion to amend/correct RICO case statement.

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Timekeeper Name	Work Date	Work Hrs	Narrative
Carl Hennies	6/22/2020	0.30	Review draft Swart affidavit and related correspondence; review correspondence related to extension for Krupa to respond to motion to amend RICO case statement and related correspondence.
Andrew H. Schapiro	6/24/2020	0.20	Correspond with opposing counsel re deposition date.
Andrew H. Schapiro	6/25/2020	1.00	Review R. Anna's draft letter re confidentiality designations. Email traffic with Wyche re scheduling of deposition. Call with court-reporter service re logistics for remote deposition.
Katherine B. Fuller	6/25/2020	0.40	Coordinate remote deposition (.2); update files to reflect full docket (.2).
Carl Hennies	6/25/2020	0.20	Review correspondence regarding document production by Crowds and deposition of Swart.
Andrew H. Schapiro	6/26/2020	0.30	Correspond with Wyche re Swart deposition.
Andrew H. Schapiro	6/30/2020	3.50	Participate in demo of remote deposition technology. Email traffic re deposition. Begin work on deposition topics and structure.
David Lakin	6/30/2020	1.50	Prepare for deposition; confer with W. Kim re document collection; review documents.
Andrew H. Schapiro	7/1/2020	1.80	Deposition prep. Alcantra seeks new date for deposition. Email traffic re same. Review Alcantra's draft stip to extend Answer date. Respond to Alcantra.
David Lakin	7/1/2020	0.20	Review draft status report.
Andrew H. Schapiro	7/2/2020	2.00	Zoom meeting with Wyche and D. Paul re strategy for upcoming deposition. Review draft notice of deposition. Email traffic re rules regarding same. Email from D. Paul re timeline and evolution of Krupa's work with Swart.
David Lakin	7/2/2020	1.00	Attend meeting with Bakala team.
Andrew H. Schapiro	7/3/2020	0.40	Email from D. Paul re evidence of Krupa's direct involvement.
Andrew H. Schapiro	7/6/2020	1.30	Review suggested questions for Swart dep sent by D. Paul. Prepare for dep.
David Lakin	7/6/2020	0.50	Pull documents for Swart deposition and organize documents into folders.
Carl Hennies	7/6/2020	0.10	Review court orders on extension of time to file answer and motion to file supplemental RICO case statement.
David Lakin	7/7/2020	1.20	Review correspondence re discovery; review new Swart production.
Andrew H. Schapiro	7/8/2020	2.00	Prepare for Swart deposition.
David Lakin	7/8/2020	2.20	Prepare Swart deposition outline for A. Schapiro.
David Lakin	7/9/2020	3.30	Draft and edit Swart deposition outline; confer with A. Schapiro re same.
Andrew H. Schapiro	7/10/2020	2.00	Work on deposition outline and prep.
Andrew H. Schapiro	7/13/2020	2.30	Deposition prep. Call from Alcantra seeking to postpone deposition. Email traffic re same.
David Lakin	7/13/2020	0.50	Discuss pulling documents with W. Kim; draft email re deposition outline to A. Schapiro.
Andrew H. Schapiro	7/14/2020	1.40	Zoom meeting with Wyche and D. Paul. Prep for and followup to same. Email traffic re various Swart issues.
David Lakin	7/15/2020	0.90	Review correspondence from A. Schapiro and attend meeting.
Carl Hennies	7/17/2020	0.60	Review draft motion for default judgment.
Andrew H. Schapiro	7/21/2020	0.50	Call with Alcantra re Swart's concerns re possible privilege waiver, etc. Email correspondence.
Andrew H. Schapiro	7/22/2020	0.30	Internal email correspondence re default judgment draft.
David Lakin	7/22/2020	1.50	Review and edit memorandum in support of default judgment.
Carl Hennies	7/22/2020	1.70	Review and revise motion for default judgment; conference with team regarding same; review correspondence related to settlement and deposition of Swart.
Andrew H. Schapiro	7/23/2020	0.70	Further review of draft default judgment; circulate to Wyche. Email.



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Timekeeper Name	Work Date	Work Hrs	Narrative
Andrew H. Schapiro	7/28/2020	0.40	Review ruling from appellate court in "Serbina" case; email correspondence re same.
Carl Hennies	7/28/2020	0.10	Review recent documents sent by DP.
Andrew H. Schapiro	7/29/2020	0.30	Alcantra send draft confidentiality order. Email.
Carl Hennies	7/29/2020	0.10	Review recent documents sent by DP.
Andrew H. Schapiro	8/5/2020	0.60	Review proposed consent motion and proposed revision sent by R. Anna. Email traffic re same.
Andrew H. Schapiro	8/6/2020	0.50	Review revised confidentiality agreement from Alcantar. Email correspondence re same.
Katherine B. Fuller	8/7/2020	0.10	Update files to reflect full docket.
Andrew H. Schapiro	8/10/2020	0.50	Review recent media-monitoring circulations.
Andrew H. Schapiro	8/11/2020	0.70	Review proposed revisions sent by Alcantra. Email traffic re same.
David Lakin	8/11/2020	0.60	Review Swart declaration; send redline.
Carl Hennies	8/11/2020	0.20	Review Swart edits to declaration.
Andrew H. Schapiro	8/12/2020	0.50	Email correspondence re edits to declaration.
Andrew H. Schapiro	8/13/2020	0.80	Zoom conference with Wyche re Swart status and strategy. Review MW markup of Alcantar's markup.
David Lakin	8/13/2020	1.20	Conduct email with Bakala team; review declaration; review documents in support of declaration.
Carl Hennies	8/13/2020	1.50	Review revised Swart declaration and prepare redline of same; TC with team regarding declaration and next steps; review and revise Swart declaration to add citations to factual statements deleted by Swart.
David Lakin	8/14/2020	0.50	Review Swart declaration with document support.
David Lakin	8/15/2020	2.90	Review document database and edit Swart declaration; draft email re same.
Andrew H. Schapiro	8/18/2020	0.50	Correspond with Wyche re edits to dec and supporting documents.
Andrew H. Schapiro	8/20/2020	0.50	Receive and review Wyche's edits to Swart declaration.
David Lakin	8/20/2020	1.20	Confer with A. Schapiro; edit Swart declaration; circulate email re same.
Carl Hennies	8/20/2020	0.20	Review updated Swart declaration and related correspondence.
Andrew H. Schapiro	8/21/2020	0.40	Transmit response / revisions to opposing counsel. Confer with Lakin re same.
David Lakin	8/21/2020	0.30	Draft email to opposing counsel.
Andrew H. Schapiro	8/26/2020	0.50	Review recent media-monitoring circulations
Andrew H. Schapiro	8/27/2020	1.50	Call with Alcantar. Review redline. Call with Wyche. Followup.
David Lakin	8/27/2020	1.50	Confer with Bakala team; edit Swart declaration; circulate email re same.
Carl Hennies	8/27/2020	0.90	Review Swart redlines to declaration; TC with team regarding declaration, deposition, and next steps.
Andrew H. Schapiro	8/28/2020	0.70	Transmit edits and our position to Alcantar. Review his counter-edits. Email traffic re same.
Carl Hennies	8/31/2020	0.20	Review Swart's redline of affidavit and related correspondence.
Andrew H. Schapiro	9/1/2020	1.30	Email correspondence re edits to Swart declaration and re parties' positions on same. Review proposed changes.
Carl Hennies	9/1/2020	0.10	Review correspondence regarding Swart declaration and related issues.
Andrew H. Schapiro	9/2/2020	0.80	Send revisions to opposing counsel; phone conference with opposing counsel re same; emails re same.
Andrew H. Schapiro	9/3/2020	1.00	Correspond with Wyche re opposing counsel's latest proposals; prepare counterproposal. Confer with D. Lakin re deposition plan.
David Lakin	9/3/2020	0.50	Review outline for Swart deposition; review documents re same.



## APPENDIX B

Timekeeper Name	Work Date	Work Hrs	Narrative
	Stephen Swedlc	30.5	
	Carl Hennies	223.8	
	David Lakin	638	
	Margaret Haas	326.9	
	Katherine Fuller	29.9	
	<b>Total</b>	<b>1898.2</b>	